

NOTICE OF MEETING

Meeting:	PLACE AND SUSTAINABILITY OVERVIEW AND SCRUTINY PANEL
Date and Time:	THURSDAY, 7 MARCH 2024, AT 6.00 PM
Place:	COUNCIL CHAMBER - APPLETREE COURT, BEAULIEU ROAD, LYNDHURST, SO43 7PA
Enquiries to:	Email: joe.tyler@nfdc.gov.uk Joe Tyler Tel: 023 8028 5982

PUBLIC PARTICIPATION:

Members of the public may watch this meeting live on the [Council's website](#).

Members of the public may speak in accordance with the Council's public participation scheme:

- (a) on items within the Place and Sustainability Overview and Scrutiny Panel's terms of reference which are not on the public agenda; and/or
- (b) on individual items on the public agenda, when the Chairman calls that item. Speeches may not exceed three minutes.

Anyone wishing to speak should contact the name and number shown above no later than **12.00 noon on Monday, 4 March 2024**.

Kate Ryan
Chief Executive

Appletree Court, Lyndhurst, Hampshire. SO43 7PA
www.newforest.gov.uk

This agenda can be viewed online (<https://democracy.newforest.gov.uk>).

It can also be made available on audio tape, in Braille and large print.

AGENDA

Apologies

1. MINUTES

To confirm the minutes of the meeting held on 11 January 2024 as a correct record.

2. DECLARATIONS OF INTEREST

To note any declarations of interest made by members in connection with an agenda item. The nature of the interest must also be specified.

Members are asked to discuss any possible interests with Democratic Services prior to the meeting.

3. PUBLIC PARTICIPATION

To receive any public participation in accordance with the Council's public participation scheme.

4. WATER SUPPLY DISRUPTION - POST INCIDENT REVIEW (Pages 5 - 16)

For Panel to consider the post incident review report and the associated action plan.

5. CALL-IN REQUEST - HAMPSHIRE MINERALS AND WASTE PLAN (PARTIAL UPDATE) CONSULTATION RESPONSE (Pages 17 - 42)

Following the request from Cllrs J Davies, P Woods, M Wade, S Osborne, J Richards, D Millar and J Haywood on the Hampshire Minerals and Waste Plan (Partial Update) Consultation Response Portfolio Holder decision, which agreed the proposed response to the Hampshire County Council's Mineral and Waste Plan: Partial Update, this matter will now be considered by the Panel.

It is for the Panel to consider the issues being raised by the above-named Councillors, as set out in paragraphs 2.3 – 2.9 of the report.

Please note: In accordance with the Council's procedures, as more than two Members requested that the decision be called in, the decision has not been implemented and will not be implemented until the procedures in paragraphs 4.2 and 5.2 in the Council's Call in Procedure for Executive Decisions have been completed. The matter has been referred to this Panel for consideration and all Councillors that submitted a formal call-in have been invited to attend and speak.

6. SOLENT FREEPORT: SECURING A LEGACY FOR THE NEW FOREST (Pages 43 - 52)

To consider the Solent Freeport: Securing a Legacy for the New Forest report.

7. SUPPLEMENTARY PLANNING DOCUMENT: PLANNING FOR CLIMATE CHANGE (Pages 53 - 184)

To consider the Supplementary Planning Document: Planning for Climate Change, providing comments to Cabinet on the intended recommendations.

8. GRASS CUTTING PROGRAMME - SPRING 2024 (Pages 185 - 190)

For Panel to consider the Council's approach to grass cutting in Spring 2024, with a "Let it Bee" campaign in support of the national No Mow May initiative.

9. PORTFOLIO HOLDER'S UPDATE (Pages 191 - 194)

An opportunity for the Portfolio Holder's to provide an update to the Panel on developments within their portfolio.

10. WORK PROGRAMME (Pages 195 - 196)

To agree the work programme to guide the Panel's activities over the coming months.

To:

Councillors

Steve Rippon-Swaine (Chairman)
Alvin Reid (Vice-Chairman)
Peter Armstrong
Keith Craze
Allan Glass
Matthew Hartmann
Stephanie Osborne

Councillors

Adam Parker
Malcolm Wade
Jack Davies
John Haywood
David Millar
Phil Woods

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PLACE AND SUSTAINABILITY OVERVIEW AND SCRUTINY PANEL – 7 MARCH 2024

WATER SUPPLY DISRUPTION – POST INCIDENT REVIEW

1. RECOMMENDATIONS

- 1.1 That Panel Members note the issues raised within the report and the associated action plan.

2. INTRODUCTION

- 2.1 At the end of October 2023, New Forest District Council (NFDC) experienced significant impacts (particularly along the district's coast) with flooding and structural damage, from adverse weather brought about by Storm Ciaran.
- 2.2 Council services responded to the impacts by warning and informing the public of the predicted adverse weather conditions, preparing for and monitoring coastal and flooding issues, and invoking business continuity plans to ensure critical services were still delivered.
- 2.3 On 2 November 2023 at 17:00 the Emergency Planning Officer at NFDC was notified of an incident at Testwood Water Treatment Plant located east of Totton, due to flooding caused by Storm Ciaran. There was an issue with the raw water quality coming from the River Test and the high levels of turbidity (cloudiness or haziness of the water supply caused by suspended matter in the water) had resulted in the Testwood plant shutting down. The measurement of turbidity is a key test of both water clarity and water quality.
- 2.4 A decision was taken by Southern Water to stop the water supply to the eastern New Forest area below and including Marchwood, which resulted in a large-scale water disruption incident for 18,838 properties along the 'Waterside'.
- 2.5 This resulted in a major incident being declared and a multi-agency response was stood up for an extended period of time, in order to respond to and support affected communities.
- 2.6 NFDC stood up its Emergency Control Centre (ECC) on Friday 3 November 2023 and internal command structure to manage the Council's response, in conjunction with the management of the incident by our partners. The ECC supported the multi-agency response to:
 - i. Open an additional water distribution centre in Calshot at St Georges Hall with the assistance of Fawley Parish Council.
 - ii. Redirect Council staff to open and manage distribution at St Georges Hall on day 1 of the incident.
 - iii. Utilise Council operatives to transport water between Gang Warily and Calshot.
 - iv. Collect local information and feed this back into the multi-agency response.
 - v. Proactively pursue the change of distribution sites to more suitable locations and supported the use of Appletree Leisure Centre
 - vi. Assist some vulnerable residents obtain personal water supplies by passing on reports of vulnerable households and venues, signposting residents plus delivering a small number of supplies.
 - vii. Amplify incident communications to the district's residents through networks and social media channels.

- 2.7 The incident command structure was stood down at 11:23 on Sunday 5 November 2023, when supplies were re-established.
- 2.8 Following the incident, a debrief was undertaken internally and by the Local Resilience Forum (LRF), to review the incident response, share best practice and identify recommendations for improvements for any future incidents.
- 2.9 This report details the findings of the review and presents an action plan to address the issues raised, whilst also recognising what worked well.

3. BACKGROUND

- 3.1 The Civil Contingencies Act 2004 (the Act) sets out the legislative framework for the NFDC to respond as a category 1 responder to civil emergencies, whilst continuing to perform its functions. The responsibilities under this Act include assessing the risk of emergencies occurring and using this to inform contingency planning and putting in place emergency plans and business continuity management arrangements.
- 3.2 The Act defines an emergency as an event or situation which threatens serious damage to human welfare in a place in the United Kingdom (UK), the environment of a place in the UK, or war or terrorism which threatens serious damage to the security of the UK. The disruption to a supply of water, poses a threat to human welfare and requires category one and two responders to have plans in place, for the purpose of mitigating the effects of an emergency.
- 3.3 The Water Industries Act 1991 sets out the main powers and duties of the Water Companies and The Security and Emergency Measures Direction 2022 (SEMD) requires water providers to provide plans to ensure provision of water by alternative means, should the piped water supply fail.
- 3.4 The SEMD stipulates that Water Providers must supply no less than 10 litres of drinking water per person per day, to all those affected within the first 24 hours of a provider becoming aware of an incident and maintain this supply until the piped supply is restored.

4. SCOPE OF THE REPORT

- 4.1 This report solely reviews the activities carried out and lessons learnt following the water disruption incident in November 2023 and matters around flooding and pollution incidents relating to Southern Water are outside the scope of this report.
- 4.2 The incident was the localised interruption in the piped water supply arising from an asset failure at Testwood Water Treatment Plant and the disruption of water supply to 18,838 properties over a 3-day period in the waterside area of the New Forest.
- 4.3 The concerns around the impacts of recent storms on sewer networks, storm overflows and the potential for pollution incidents are recognised but not discussed in this report. The Environment Agency is the body responsible for regulating water quality and ecological protection and will investigate and take appropriate action for any offences where a water pollution activity occurs. The Council will continue to support and work with the Environment Agency if required, should there be incidents within the district.

5. ROLES DURING AN INCIDENT

- 5.1 It is the responsibility of the water provider to identify the cause of any water disruption issue and the time it will take to rectify the problem. It is their role to identify alternative water supplies, for the provision of portable water for distribution, to identify vulnerable customers, lead on communications, identify and communicate with sensitive venues, such as care homes, provide water for livestock and consider the long-term impacts on communities.
- 5.2 The role of category 1 responders (which includes the District Council and other agencies) in a water disruption incident, is to support the water provider with media and communications with the public, support the water provider to ensure bottled water sites are suitable to allow distribution of water bottles, identification of vulnerable people and support with the distribution and assist with access to the water collection sites.
- 5.3 NFDC will also consider the risk to health, if water was unfit and the Environmental Health service work with the Drinking Water Inspectorate and businesses based on the impact of the lack of water, public health issues around flushing toilets, laundry etc and decisions on whether it was safe for businesses to operate.
- 5.4 The role of the Local Resilience Forum (LRF) is to ensure that multi agency processes and procedures are in place to respond to an emergency. The generic national framework for managing emergency response and recovery identifies three tiers of management and the relationship between them. This includes:
- Strategic “gold command” – considering the long-term impact and risks, defining and communicating strategies and objectives for the response.
 - Tactical “silver command” – senior operational officers determine priorities, plan and coordinate tasks and ensure the health and safety of the public.
 - Operational “bronze command” – officers deployed to undertake work at the site of the emergency, liaising with other agencies and communicating back.

6. ISSUES IDENTIFIED AND ACTIONS

- 6.1 A number of issues were identified from feedback gathered and observations during the incident. These are summarised in the action plan in **Appendix 1**.
- 6.2 Initial feedback from NFDC officers involved in the incident was that whilst there were some internal improvements which could be made regarding the Council’s own response, officers worked well together, stood up the ECC response and both Members and officers worked hard to support our communities.
- 6.3 The main feedback centred around the following areas:
- Delay in notification from Southern Water on the potential large-scale loss of water supply to residents in the waterside area of the New Forest.
 - Issues with the setup, location and management of bottled water sites.
 - Traffic congestion around the sites and movement on the sites.
 - Accurate and timely mapping to identify vulnerable customers and sensitive infrastructure.
 - Provision of data for assurance on delivery to all vulnerable customers.
 - Timely sharing of public messaging from the water providers and between agencies.

- Sufficient resource, expertise and resilience within NFDC to respond to and recover from an incident (particularly over a protracted incident).
- The importance of plan reviews, training and exercising to ensure preparedness for any future incidents.
- Effective use of technology to aid communication and record keeping during an incident.
- Longer term engagement with water providers to review strategic investment plans are robust in improving infrastructure and reducing the likelihood of future incidents.

6.4 The action plan identifies actions and improvements to be implemented, where these actions have been fed into the LRF debrief (who will identify actions, who is responsible and priorities for completion) and where the responsibility lies with NFDC to implement the improvements.

7. ACTION TAKEN SINCE THE INCIDENT

7.1 Following the incident, further work has taken place which includes:

- A joint letter sent to the Chief Executive of Southern Water on 15 December 2023 from Hampshire Local Authority Leaders, regarding serious concerns around repeated water disruption incidents and their impact and inadequate support for local residents.
- An LRF multi-agency debrief on 2 February 2024, which NFDC attended and fed in issues identified following the incident.
- A Stakeholder meeting was held on 26 February 2024, attended by the Chief Executive of Southern Water and Hampshire Local Authority Leaders and Chief Executives, to discuss plans to address concerns around infrastructure, response methods and future proofing. The meeting was productive and Southern Water recognised the concerns raised by key stakeholders and the need for significant improvements. A further follow up meeting will be arranged between New Forest District Council and Southern Water to explore further collaboration and practical arrangements in the event of another incident.
- Training on 7 March 2024, delivered by HCC, for Members on their role during and following an emergency incident.
- This report being presented to the Place and Sustainability Overview and Scrutiny Panel on 7 March 2024 on NFDC's response to the incident and lessons learnt.

7.2 There will be future attendance by the Lead Officer for Emergency Planning at a HIOW LRF Water Disruption Task and Finish Group set up to apply learning from previous water supply incidents, improve data sharing, identify an approach to water distribution sites and review the water disruption plan.

7.3 OFWAT (as the Water Services Regulation Authority) have the role of ensuring water companies provide the best service to customers and communities, improve the environment and make sure water supplies are secure for future generations. Planning officers are members of a Southern Water Stakeholder Group, which is attended by OFWAT and they have raised the local issues around water disruption, pollution and flooding, in order for OFWAT to review Southern Water's performance and future strategic plans.

- 7.4 Southern Internal Audit Partnership has undertaken a review of the Council's Business Continuity arrangements and are reviewing the Emergency Planning provision. The initial assurance opinion for business continuity is reasonable with some non-compliance and scope for improvement identified. The actions highlighted in the report are to ensure critical activity response plans are in place for all relevant areas and that they are regularly reviewed and up to date.

8. CONCLUSION

- 8.1 Whilst there are many smaller incidents that are dealt with on a regular basis to ensure our communities are protected and supported, this was the first major incident that NFDC has responded to, requiring the set up of the Emergency Control Centre, since the significant storm event in February 2014. Whilst there were wider issues outside of the District Councils area of control or responsibility, the District Council's response was good and positive lessons were learned to inform future incidents.
- 8.2 Implementation of the identified actions in the table are required, to improve the preparedness for any similar water disruption or emergency incidents, and through further engagement with the water provider and regulator to reduce the likelihood of future incidents occurring.
- 8.3 Community resilience will be key in the future, in supporting local communities and agencies to prepare for and respond to emergencies. Many communities are aware of the risks which may affect them and know the skills, knowledge, resources, and assets they have to help prepare for and deal with the consequences of emergencies they may encounter.
- 8.4 The Council's next Community Forum on 27 March 2024 covers community resilience and the work on devising community plans to aid resilience and response.

9. FINANCIAL IMPLICATIONS

- 9.1 As the Council has a duty to respond to emergency incidents there is inevitably time and expense costs attributed to the Council's response. For reference purposes a total of 326 hours (standard time, standby and overtime) were spent by council officers responding to this incident, with an additional indicative cost in overtime of £6,574 and approximately £300 in mileage costs.

10. CRIME & DISORDER IMPLICATIONS

- 10.1 None directly arising from the report although some of the public did become frustrated at the bottled water sites due to the traffic congestion that impinged on the site management by the water company.

11. ENVIRONMENTAL IMPLICATIONS

- 11.1 Water providers have a duty to protect water resources and make sure their supplies are resilient. They need to consider how to mitigate climate change impacts and future demands and avoid polluting the environment.

12. EQUALITY AND DIVERSITY

12.1 It is a legal requirement for water providers to ensure that all residents have a wholesome supply of drinking water, with a particular focus on those who are considered vulnerable.

For further information contact:

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Background Papers:

None.

APPENDIX 1

IDENTIFIED ISSUES BY NFDC AND ACTION PLAN

	Identified Issue	Lesson/ Suggested Solution	Action	Responsible
	Notification			
1	Delay in the notification of the incident at Testwood Water Treatment Plant caused due to Storm Ciaran.	Clear understanding from all agencies on their roles within the water disruption plan.	Earlier notification from the water provider of a potential incident to activate the correct level of multi-agency response.	Comments fed into the LRF water disruption debrief on 2 February 2024.
	Plans			
2	The time taken to implement the LRF water disruption plan to ensure the water provider met statutory duties and the demands of the community.	Ensure all organisations are aware of the LRF Water Disruption Plan for it to be implemented effectively and efficiently.	Maximise the opportunities for training and exercising and attendance from Cat 2 responders at training events.	Comments fed into the LRF debrief for action.
	LRF Structure			
3	A logistics cell was not established which would have supported in the coordination of water distribution to the community.	Review of scalable structures to stand up quickly and support in the allocation of resources. All actions from cells to be recorded and reported into the correct command structure meeting.	Appropriate cells to be stood up during an incident to ensure correct resource and support is identified. All actions from the cells to be recorded and reported into the correct command structure meeting.	Comments fed into the LRF debrief for action.

Bottled Water Sites				
	Identified Issue	Lesson/Suggested solution	Action	Responsible
4	Two of the initial bottled water sites which were identified by Southern Water and set up, were outside the New Forest district, which extended the time to set up bottled water sites in locations which would support the affected communities.	Review and scoping of bottled water site locations, to also consider access for those who do not have a car or access to public transport.	Sites to be reviewed and updated by NFDC and forwarded to the LRF Task and Finish Group, for Southern Water to scope these against their requirements.	NFDC, Task and Finish Group and SW
5	NFDC advice on where additional sites should be located closer to isolated communities, was overall not implemented or too slow.	Predetermined bottled water sites to maximise closeness to affected communities and a variety of models for water collection.	Southern Water to consider supersites with smaller satellite sites to distribute water to more isolated communities, and to have a range of transport options which can access smaller sites.	Comments fed into the LRF debrief for action.
6	The opening hours of the sites were not long enough after the initial outage to enable households to gain water through the first evening/night, particular for those working during day time hours.	Arrangements need to be in place to meet 24/7 demand, if required.	Earlier notification of a potential incident, pre-determined sites and mutual aid request where inadequate resource to support any extended operation.	Comments fed into the LRF debrief for action.
7	Water supply to the distribution centres was inadequate leading to community tension.	Sites identified based on potential traffic management issues and support from HCC Highways team during an incident.	Proposed sites to be reviewed by members of the task and finish group. Cells stood up with membership from appropriate agencies and teams.	Comments fed into the LRF debrief for action. Task and Finish Group.
8	Traffic management and advice regarding access and flow of traffic at the bottled water sites was not in place.	Schematic layouts of more water sites which include traffic management.	Plans for the operation of bottled water distribution sites.	Comments fed into the LRF debrief for action.

	Priority/Vulnerable Customers			
	Identified Issue	Lesson/Suggested solution	Action	Responsible
9	Time taken to understand the areas without a water supply and how many vulnerable people or sensitive premises were in those areas.	Improved mapping required to quickly identify locations affected by water disruption incidents and also vulnerable residents within these locations.	Improved data mapping from the water provider to cross reference with vulnerable person lists.	Comments fed into the LRF debrief for action. Task and finish group to action this.
10	Data to provide assurance regarding the reach to the Priority Services Register was not available or provided. There was data regarding initial bottles delivered, but no data on how many not reached, or the additions to the list and their supply.	Wider consistent understanding of vulnerable people and sensitive infrastructure and timely data on this information.	Improved data mapping and communications between the water provider and the Council.	Comments fed into the LRF debrief for action. Task and finish group to action this.
11	Both political and significant community feedback that vulnerable people did not receive water from Southern water.	Ability to update and report on the 'Priority services register' list in real time. Increased number of vulnerable residents on the register.	Regular communication to the public regarding the priority services register. Community resilience plans to identify and support vulnerable people within communities. Improved mapping system.	NFDC Communications Emergency Planning Task and Finish group
Media Information				
12	Delays in public messaging from Southern Water for partners to share.	Earlier communication from the Water Providers in order for local communication teams to support with the messaging for the public/communities.	Rolling email media chain to keep communications teams informed of messaging from the very beginning of the incident.	Comments fed into the LRF debrief for action.
13	Internal messages weren't consistently communicated, and various methods of	Clear processes for communication and	Review and implement systems to best use M365 for communication during an incident.	NFDC

	communication were used which hindered information flow.	confirmation of the method to be used.		Emergency Planning communications and ICT
14	Time taken for sign off some of the external communications messages.	Clear sign off process and priority given to public messaging in an emergency situation.	Review communications messaging sign off process and timescales.	NFDC Communications
Staffing resource				
15	Emergency planning resource and resilience due to timing of the incident (following a week of response to Storm Ciaran and after half term holiday).	Further resilience gained by increasing knowledge within the council and signing up more officers into emergency planning roles.	Increase the number of officers on the emergency planning gold and silver rota and provide training. Review number of officers in emergency planning roles and actively recruit across the council. Amend JDs/T&Cs of appropriate level officers.	NFDC
16	Reduced Emergency Planning expertise and resilience due to a vacant part time emergency planning post.	Increase emergency planning knowledge within the Council and review external support available.	Review of the current internal resource for emergency planning, consider options for recruitment, shared resources and support from neighbouring local authorities.	NFDC
17	Loss of experienced officers and fewer NFDC volunteering for roles	Consideration of options to recruit more internal staff into emergency planning roles	Review of the resource and skills required and current terms and conditions for officers undertaking a role. Recruit more officers. Service Managers job descriptions to include the requirement to be involved in emergency planning.	NFDC

18	New/inexperienced staff and significant time period between live incidents to gain experience.	Ensure staff are confident to undertake the response and recovery role in an emergency.	Review of training and exercising for staff across the organisation.	NFDC with support from HCC on training/exercising.
19	Significant time period since previous emergency planning training for Members and many newer Members now in post.	To provide training for Members on the political, civic and community role during an emergency.	Hampshire County Council – Emergency Planning Team to provide training for all Members on the Council’s responsibility and role prior to, during and after an emergency.	NFDC and HCC
Use of Technology				
20	Use of technology to support the response and recovery phase for an incident in NFDCs Emergency Control Centre (ECC) or operating remotely.	Further utilisation of ICT (M365) to support the communication and record keeping during the response and recovery phases of an incident.	Continue to build the emergency planning SharePoint site and work with ICT to develop processes and procedures for use of M365 within the ECC or remotely.	NFDC (Emergency Planning and ICT)
Long Term Strategy				
21	Concerns around the future resilience of the Testwood site and investment from Southern Water to reduce the likelihood of further incidents.	Improved strategic planning and engagement with the Water Providers. Consideration of the new requirements in DEFRA’s Emergency Planning Guidance for the Water Industry.	Attendance by the Leader and Chief Executive at the Southern Water Stakeholder meeting to discuss incident response practices and strengthening resilience with improvements to infrastructure at Testwood. Planning officers to attend the Local Authority Stakeholder group and review Southern Water future business plans as part of the Local Plan review process.	NFDC

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PLACE AND SUSTAINABILITY OVERVIEW AND SCRUTINY PANEL: 7 MARCH 2024

CALL IN REQUEST - HAMPSHIRE MINERALS AND WASTE PLAN (PARTIAL UPDATE) CONSULTATION RESPONSE

1. RECOMMENDATION

1.1. That the Panel considers the call-in submission by Cllrs Malcolm Wade, Jack Davies, David Millar, Janet Richards, Phil Woods, Stephanie Osborne and John Haywood.

1.2. The Panel shall either:

A) - Accept the decision (in which case it may be implemented immediately); or

B) - Request the decision-maker reconsider the decision, giving reasons for the request. The decision-maker shall reconsider the decision as soon as reasonably practicable. After reconsideration the decision, whether amended or not, may be implemented immediately, and may not be called in for a second time under the procedures in Chapter 4/8 of the Council's Constitution; or

C) - Where the decision is of particular high local significance or public interest, refer the decision to full Council for debate at a Council meeting to be held within ten working days of the Panel meeting. If necessary to meet this timescale, a special Council meeting shall be held. The Monitoring Officer shall be responsible for arranging this. The decision maker shall reconsider the decision as soon as reasonably practicable after the Council meeting, in the light of the Council debate.

2. INTRODUCTION

2.1. Hampshire County Council (HCC) is working to produce a partial update to the Hampshire Minerals and Waste Plan (HMWP) which will guide minerals and waste decision making in the Plan Area up until 2040. The HMWP forms part of the Development Plan for New Forest District. The partial update to the Plan aims to build on the currently adopted Hampshire Minerals and Waste Plan (2013), eventually providing new and updated policies based on up-to-date evidence of the current levels of provision for minerals and waste facilities in the Plan Area. New Forest District Council is a consultee in the process, and intends to submit representations on the Regulation 19 Proposed Submission Plan which is currently out for public consultation.

2.2. To help inform the Council's response, and enable District Council Members to have a full understanding of the changes that had been made since the Regulation 18 version of the Plan, an in-person briefing was provided by HCC officers on 11 January 2024. Full details of the public consultation are provided on HCC's website¹.

2.3. In preparing a decision report for the Cabinet Member's consideration, officers consulted with the directly affect ward Councillors on 9 February 2024 to seek their

¹ <https://www.hants.gov.uk/landplanningandenvironment/strategic-planning/hampshire-minerals-waste-plan/minerals-waste-plan-partial-update-consultation/hmwp-partial-update>

views on a draft response. Responses were received from Cllr Christine Ward and Cllr Keith Craze in relation to the Ashley Manor Farm site. Concerns were raised in relation to sensitivity of the landscape, lack of screening, dust emissions, impacts on biodiversity, proximity to the cemetery, and adverse traffic movements. Cllr Alvin Reid also responded to express support for the removal of Yeatton Farm from the HMWP. Based on the responses received no further changes were identified as being required to the report.

- 2.4. Subsequently on 22nd February 2024 the Portfolio Holder for Planning and Economy, Cllr Derek Tipp, made a decision on New Forest District Council's response to HCCs HMWP². The response identified that the Plan has been updated to address a number of this Council's concerns previously expressed on the policies and proposed allocations (including the development considerations for each site set out in Appendix A of the HMWP) in relation to New Forest District. There are however a few matters of uncertainty/lack of clarity where wording changes to the Plan are to be sought.
- 2.5. Following this Portfolio Holder decision, Cllr Malcolm Wade gave formal notice to call-in the decision. He stated the following as the reason for the call in: *"This decision does not fully address the range of environmental issues the Midgham site will have on the local area if it is accepted for mineral extraction and the response has watered down the objections. This site requires further and greater inspection and discussion to produce a more focused response on the issues highlighting the objections to this proposal"*.
- 2.6. Additionally, Cllr Jack Davies also gave formal notice to call-in the decision. He stated the following as reason for the call-in: *"The particular response provided by Cllr Tipp to the proposal for Midgham Farm is inadequate and waters down the previous objections made by New Forest District Council"*.
- 2.7. Also giving formal notice to call-in the decision was Cllr David Millar who wrote: *"Having read the decision I find that it does not completely address all the issues raised in NFDC's initial response and there does not seem to have been sufficient scrutiny of the environmental impact relating to changes that are proposed to address access issues. There also seems to be an error of fact in the document, that the site at Midgham farm is an extension of an existing site, which is just not true. I think the council would benefit from more detailed consideration of this important topic which could have significant impact on our landscape"*.
- 2.8. Cllr Janet Richards gave formal notice to call-in the decision with the following: *"The proposed response does not fully address all of the impacts of the Midgham Farm site on the environment and local residents"*.
- 2.9. Also giving formal notice to call-in the decision was Cllr Phil Woods who wrote: *"Having read the decision, I think it does not cover the issues previously raised by NFDC at the earlier consultation. Furthermore, it seems to make light of the environmental impact on the local area, road network and Fordingbridge's neighbouring town Alderholt. There also seems to be an error of fact in the document, that the site at Midgham farm is an extension of an existing site, which is not true. I think the council would benefit*

² <https://democracy.newforest.gov.uk/ieDecisionDetails.aspx?id=1159&LLL=0>

from a more detailed consideration of this important topic which could have significant impact on Fordingbridge and its surrounds”.

- 2.10. Cllr Stephanie Osborne also gave formal notice to call-in the decision. Her reasons focused on Midgham Farm and were as follows: *“There does not seem to have been sufficient scrutiny of the environmental impact relating to changes that are proposed to address access issues. This site requires further and greater inspection and discussion. It will have lifelong changes on this area and little of benefit to the residents”.*
- 2.11. Finally, Cllr John Haywood gave formal notice to call-in the decision. His reasons for call-in were: *“The Midgham Farm site is situated in the Fordingbridge, Godshill and Hyde ward but it directly borders Ringwood North and Ellingham (RN&E). Road access suitable for heavy goods vehicles also mostly passes through RN&E. While from an operational standpoint for the companies extracting the aggregates this might be seen as a continuation of a single operation, for local residents and in terms of overall impact it most definitely represents a new site. This decision does not appear to fully consider the environmental and landscape impact, the impact on local residents and the impact on users of local roads. I therefore request that it is reconsidered”.*
- 2.12. In accordance with Council procedures, as seven call-in notices have been received, the decision will be discussed at this meeting of the Place and Sustainability Overview and Scrutiny Panel.
- 2.13. As the decision is being reviewed by the Panel, the relevant Cabinet Portfolio Holder has been invited to attend. The Panel may also wish to call upon the appropriate officers to provide further information to the Panel in connection with the decision.
- 2.14. The panel will either accept the decision, request the decision-maker to reconsider the decision giving reasons for the request or alternatively refer the decision to Full Council for a debate if it is considered that there is a particularly high local significance or public interest.

3. BACKGROUND

- 3.1 The full details of the reasons as to why the Portfolio Holder for Planning and Economy made the decision can be found in the report to the Portfolio Holder at **Appendix 1**.

4. NFDC PROPOSED RESPONSE TO HMWP

- 4.1 All of the call-in notices specifically make reference to the Midgham Farm proposed minerals site, in particular that insufficient scrutiny has been given to environmental issues and impacts on local residents relating to this site. Wider concerns about how the HMWP addresses vehicular access is also evident, and several of the requests to call-in also cite that the response departs/deviates from the objections submitted by NFDC to HCC at the previous Regulation 18 stage.
- 4.2 The Regulation 19 HMWP was published alongside several updated background papers. Those papers have updated the evidence base and provide refreshed

projections for the supply and demand of aggregates. The updated HMWP deleted a number of sites from the draft strategy. In addition, the HMWP update inserted a significant number of new development considerations for each proposed mineral site which respond to concerns raised at Regulation 18 stage. Table 1 below sets out how NFDCs previous comments have been addressed or remain outstanding in the updated plan.

Table 1

HMWP issue	Regulation 18 response (January 2023) – Summary of representations	Summary of if/why NFDC position has changed since Regulation 18 representations
Mineral policies:	<p>NFDC questioned the basis for the aggregate requirement. Deemed by NFDC to be significantly above the projected shortfall, and NFDC believed that this represented an excessive potential allocation of sites.</p> <p>Economic forecasts set out in the evidence base were based on 2020 reports, including Local Aggregate Assessments, and predicted growth in construction output in 2021 and 2022 (which did not materialise due to Covid19).</p>	<p>The October 2023 Minerals: Background Study now concludes that rather than an excess in provision (Regulation 18 stage) the latest projections indicate that the site allocations as proposed in the Regulation 19 plan will provide the required supply.</p> <p>Evidence base updated with 2023 Local Aggregate Assessment. This uses more recent construction industry and general economic forecasts.</p>
Waste policies:	<p>NFDC gave general comment that HMWP reflects the latest levels of waste arising and plans positively to ensure forecasts for future waste capacity are maintained.</p> <p>Advocated strong controls on the location of anaerobic digesters in relation to water courses.</p>	<p>No further comments were required in NFDC Regulation 19 response.</p> <p>No change – reiterated in Regulation 19 proposed response.</p>
Other policies:	<p>NFDC was disappointed to see deletion of the previous HMWP Policy 14 (Community Benefits).</p> <p>NFDC suggested stronger controls on the location of anaerobic digesters near to water courses.</p>	<p>On balance officers consider that there is sufficient provision in the Regulation 19 version of the plan which enables community improvements to be secured (e.g. Policy 10: Restoration of minerals and waste development).</p> <p>No change – reiterated in Regulation 19 proposed response. NFDC suggests that the HMWP could benefit from a stronger policy approach with regard to this issue, given the potential for spillages into sensitive water courses and the significant adverse effects this can have on ecological systems.</p>
Ashley Manor Farm, New	NFDC had <u>concerns</u> about this site. Raised detrimental	The Regulation 19 version of the Plan has made changes to a number of

<p>Milton (Policy 20)</p>	<p>impacts on landscape, disturbance of cemetery visitors, and impacts on local residents. Other potential impact noted relating to the proposed Green Loop in the Neighbourhood Plan.</p>	<p>'development consideration' for this site (from 8 criteria previously to 19 now) including:</p> <ul style="list-style-type: none"> • New planting around the site; • Ecological and hydrological assessment of all watercourses, ditches and aquatic habitats; • Dust, noise and lighting management plan and monitoring is required. • Routeing Agreement will require HGV traffic to be limited to Caird Avenue between the roundabout and the New Milton Sand and Ballast plant. • Protection of footpaths and connectivity to wider network. • Flood Risk Assessment required. Site must be designed and constructed to remain operational and safe for users in times of flood, result in no net loss of floodplain storage, not impede waterflows and not increase flood risk elsewhere. <p>However, there remain some specific concerns about this site allocation which the NFDC response seeks to address. This is in relation to the adverse impacts regarding landscape impacts and noise effects. Suggestions are made on possible mitigation.</p>
<p>Midgham Farm, Midgham/ Harbridge (Policy 20)</p>	<p>NFDC submitted a holding objection. Close proximity to a residential area (Alderholt) and potential impacts. Landscape impacts identified with a call to more detail on screening and long term mitigation. Adverse effects also identified in relation to the supporting habitat to nearby SPAs.</p> <p>Acknowledged that this is remote location but that cumulative impacts with two other proposed mineral sites at Cobley Wood and Hamer Warren are of concern regarding in combination effects from vehicular movement.</p>	<p>The Regulation 19 version of the Plan has deleted the previously proposed allocations at Cobley Wood and Hamer Warren. The removal of these two sites reduces the in-combination highway impacts which were of previous concern. The Regulation 19 version of the Plan introduces a number of new development considerations (from 12 criteria previously to 23 now) including:</p> <ul style="list-style-type: none"> • Landscape buffers to the north-west corner and western edge; • An additional requirement for buffers with adjacent residential properties; • Offsite roosting, foraging and breeding areas of the qualifying bird species of nearby SPAs/Ramsars will have to be appraised; • An enhanced ecological network as part of the restoration scheme. • Routeing to the Strategic Road Network (SRN) - (A31) will be south along Hillbury Road/Harbridge Drove before joining briefly the B3081 to its junction with the A31. <p>The clarification provided in the Regulation 19 version of the Plan is considered to have</p>

		addressed the concerns that this Council previously raised on the proposed site allocation.
Purple Haze, Verwood (Policies 20 & 32)	NFDC had concerns about this site. Ecological interest at the site is deemed significant but also significant scope for restoration and enhancement. Potential adverse impact on the recreational use and enjoyment of the wider Moors Valley woodlands. Presence of Ebblake Bog SSSI adjacent to the site is a potentially significant constraint given the hydrological levels.	<p>The Regulation 19 version of the Plan introduces a number of new development considerations (from 14 criteria previously to 23 now) including:</p> <ul style="list-style-type: none"> • A Hydrological/hydrogeological assessment is required to consider whether proposed works will affect nearby sites, Ramsars and Ebblake Bog + Moors River SSSIs; • Protection of the New Forest SAC/SPA/Ramsar in relation to recreational displacement; • Restoration must include habitats to expand those within the designated sites and relate to the wider landscape and enhance ecological networks. • Routeing to the SRN (A31) will be along B3081, which is a suitable route for HGV traffic. A new priority junction will be required to the B3801 to ensure provision for people walking, cycling and horse-riding and the impact on peak flows is managed. <p>The clarification provided in the Regulation 19 version of the Plan is considered to have addressed the concerns that this Council previously raised on the proposed site allocation.</p>

FURTHER COMMENT

- 4.3 Some Members have queried the phrase used in paragraph 4.13 of the Portfolio Holder Report which reads “*the site could be viewed as an extension to the existing extraction site*”. This reference was included to illustrate the proximity of the proposed site to the existing Hamer Warren site (which at its closest point is immediately to the south-west of the Midgham Farm site on the other side of Harbridge Drove). Officers consider this reference to be appropriate. A map showing the location of the site is attached at **Appendix 2**.
- 4.4 More generally, it is recognised that minerals planning is a complex exercise with difficult decisions to be made. Options about which sites to extract are very limited due to the nature of where minerals lie and the achievability of extracting them in a sensitive way which does not cause unacceptable harm.
- 4.5 Minerals extraction has taken place in the New Forest area for a considerable period of time and many sites that are typically less constrained have already had their minerals extracted. In this context, officers do understand the concerns that some Members have raised.
- 4.6 However, the Regulation 19 version of the Plan has addressed the ‘in-principle’ concerns that this Council has previously expressed. It provides an appropriate framework within which the more detailed judgements on how sites should be

extracted should take place.

5. FINANCIAL IMPLICATIONS

5.1 None arising from this report.

6. CRIME & DISORDER, ENVIRONMENTAL AND EQUALITY & DIVERSITY IMPLICATIONS

6.1 Potentially significant impacts on nationally and internationally protected species and habitats. Localised landscape impacts would need to be addressed. Impacts on biodiversity will also require mitigation, compensation measures, and restoration (together with the requirement for measures that result in a Biodiversity Net Gain). Further assessment will be required to establish whether all impacts can be adequately mitigated.

For further information contact: Andrew Herring Planning Policy Officer 023 8028 5424 andrew.herring@nfdc.gov.uk Tim Guymer Acting Assistant Director, Place Development 02380 285987 Tim.guymer@nfdc.gov.uk	Background Papers Appendix 1 – 2024 NFDC Response to Regulation 19 HMWP consultation (including related Appendices) Appendix 2 – HCC map of Midgham Farm site
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PLANNING AND ECONOMY PORTFOLIO HOLDER DECISION - 22 FEBRUARY 2024

HAMPSHIRE MINERALS AND WASTE PLAN (PARTIAL UPDATE) CONSULTATION RESPONSE

1. RECOMMENDATION

- 1.1. To agree the proposed response to the Hampshire County Council's Mineral and Waste Plan: Partial Update as set out in section 4 of this report.

2. INTRODUCTION

- 2.1. The purpose of this report is to agree the Council's response to Hampshire County Council's (HCC) Minerals and Waste Plan: Partial Update, closing on 5 March 2024.
- 2.2. HCC is working to produce a partial update to the Hampshire Minerals and Waste Plan (HMWP) which will guide minerals and waste decision making in the Plan Area up until 2040. The HWMP forms part of the Development Plan for New Forest District. The partial update to the Plan aims to build on the currently adopted Hampshire Minerals and Waste Plan (2013), eventually providing new and updated policies based on up-to-date evidence of the current levels of provision for minerals and waste facilities in the Plan Area.

3. BACKGROUND

- 3.1. In July 2021 New Forest District Council (NFDC) responded to a previous consultation by HCC on the preparatory stages of plan making, when HCC consulted on the Sustainability Appraisal (SA) Scoping Report and SA Baseline Report. NFDC provided an officer response on the evidence base, including a comment on the balance required between meeting identified housing need in a timely manner on the one hand and the objective for prior extraction (where viable) on the other.
- 3.2. In January 2023 NFDC responded to the Regulation 18 consultation by HCC on a draft plan consultation. NFDC provided comments on the proposed policies and site allocations.
- 3.3. In particular NFDC responded on the following:
 - Development Management policies – NFDC concurred on the need for partial updates to reflect National Policy changes, and the requirement to update the evidence base. Particular support was given to policy update which addressed biodiversity and wider air quality issues.
 - Minerals policies – the criteria relating to prior extraction; questioned how the potential cumulative supply vastly exceeded the need identified in the Draft Plan; and that economic forecasts were based on 2020 report (i.e. demand has changed since then).
 - Waste policies - supportive of proposed updates relating to energy recovery, but suggested stronger controls on the location of anaerobic digesters near to water courses.
 - Other policies – deletion of Policy 14 (Community Benefits) regrettable.

- The new proposed depot at Totton rail sidings (Policy 19) – the absence of information on traffic generation – NFDC raised concerns that it could generate significant vehicle movements with adverse impacts on residents and businesses.
- Concerns that the potential cumulative supply vastly exceeds the need identified in the Draft Plan.
- Concerns relating to the in-combination transport impacts from proposed sites in the Harbridge / Midgham area, together with specific site concerns about impacts on residents in Hordle and New Milton. See Table 1 below for updated NFDC position.
- Detailed points relating to new proposed mineral and waste sites:
 - Yeatton Farm – Objection, potential adverse impacts inc loss of hedgerows, significant landscape impacts, and potential to encroach on the character of the adjoining settlements. NFDC also drew HCC to the allocated housing site (Policy SS8 – Land at Hordle Lane) immediately to the north of the proposed Yeatton Farm site. See Table 1 below for updated NFDC position.
 - Ashley Manor Farm (Policy 20) - concerns about in relation to landscape impact, the proposed Green Loop in the Neighbourhood Plan, and the proximity to residents with associated noise and dust. See Paragraphs 4.5 – 4.12 below for the updated NFDC position and proposed response.
 - Cobley Wood - Holding objection in relation to cumulative impacts from other proposed sites in the area arising from vehicle movements, and impacts on biodiversity. See Table 1 below for updated NFDC position
 - Hamer Warren Quarry (Waste – Policy 29) – agreed that proposed use for waste considered is compatible with the site, but as with Cobley Wood concerns were raised in relation to traffic movements and cumulative impacts. See Table 1 below for updated NFDC position.
 - Midgham Farm – Holding objection, with significant concerns regarding impacts on biodiversity, landscape screening, and cumulative effects with other proposed mineral and waste sites in the area. See Paragraphs 4.13 – 4.18 below for the updated NFDC position and proposed response.
 - Purple Haze – concerns about adverse impacts on the recreational use and enjoyment of the wider Moors Valley woodlands, potentially bringing more visitors to both the New Forest designated sites and the Dorset sites. Presence of Ebblake Bog SSSI adjacent to the site is a potentially significant constraint due to hydrological sensitivities of the peat mire (no transport concerns were submitted). See Paragraphs 4.19 – 4.26 below for the updated NFDC position and proposed response.

4. POLICY CHANGES TO THE HMWP AND PROPOSED NFDC RESPONSE

- 4.1. It is acknowledged that mineral resources can only be won where they exist, and the geography/geology of New Forest District means that the Plan Area is likely to have a role in meeting wider sub-regional needs. This is particularly so given that the majority of minerals extracted within Hampshire are used within the Hampshire area.
- 4.2. The Regulation 19 representation period is the last stage of public engagement before HCC submits the draft HWMP to the Secretary of State for independent examination by the Planning Inspectorate. This is a formal process that requires comments on the soundness and legal compliance of the plan¹ – comments must therefore be targeted to specific policies or paragraphs in the draft HWMP. NFDC also has the opportunity to set out the modifications that it considers necessary to make the pre-submission Local Plan legally compliant and/or sound including any revised wording.

Previously proposed mineral and waste site allocations

- 4.3. A number of the sites proposed in the Regulation 18 have been withdrawn in the Regulation 19 Proposed Submission Plan. These are set out in Table 1 below, together with the NFDC comments submitted in January 2023.

Table 1 - Sites that have been removed and the reasons given by HCC

Site:	NFDC response to previous (Regulation 18) consultation	Reason for deletion from Regulation 19 consultation	NFDC latest position
Totton Rail Sidings	the absence of information on traffic generation – NFDC raised concerns that it could generate significant vehicle movements with adverse impacts on residents and businesses.	There is insufficient evidence that this site will be delivered during the Plan period. Therefore, the site is now listed under Policy 34 as a potential site for the future should circumstances change. However, any future proposal would need to address issues regarding access to the site, impact on ecology, amenity and regeneration ambitions for the area.	This resolves concerns NFDC had on the absence of information on traffic generation. No further representations need to be made.
Yeatton Farm	Objection, potential adverse impacts including loss of hedgerows, significant landscape impacts, and potential to encroach on the character of the adjoining settlements. NFDC also drew HCC attention to the allocated housing site (Policy SS8 – Land at Hordle Lane) immediately to the north of the proposed Yeatton Farm site.	This site was withdrawn from allocation in the Plan by the landowner.	This removes the issues that NFDC had regarding the site at Yeatton Farm. No further representations need to be made.

¹ NPPF paragraph 35 sets out that Plans are ‘sound’ if they are: (a) Positively prepared (b) Justified (c) Effective (d) Consistent with national policy.

Cobley Wood	Holding objection in relation to cumulative impacts from other proposed sites in the area arising from vehicle movements, and impacts on biodiversity.	This site has been removed as a proposed allocation as the need for sand and gravel can be met from alternatives sites and could not be worked in addition to adjacent sites due to cumulative impacts. The site is small with a number of issues in relation to (but not limited to) ecology, landscape and heritage which would require mitigation such as buffers which impacts on the viability of the site to be deliverable.	The removal of this site from the plan means no further representations need to be made.
Hamer Warren	Agreed that proposed use for waste considered is compatible with the site, but as with Cobley Wood concerns were raised in relation to traffic movements and cumulative impacts	This site has been removed as a proposed allocation due to the objection from the Environment Agency and the potential for significant groundwater impacts which cannot be suitably mitigated.	The removal of this site from the plan means no further representations need to be made.

New Proposed Mineral and Waste Sites

4.4. The mineral and waste sites proposed to be allocated are summarised in Policy 20 with further site-specific details provided in 'Appendix A' of the HWMP. Each proposed minerals and waste allocation includes a number of 'development considerations' for each site e.g. effects on traffic and environmental impacts. The Minerals Plan does not specify exactly how the development considerations may be addressed, as these will be assessed through specific planning applications.

Ashley Manor Farm, New Milton (likely delivery 2024/25) - Policy 20

4.5. Land at Ashley Manor Farm (currently open agricultural land) is proposed for excavation of sharp sand and gravel. After excavation there would be restoration to agriculture with species rich meadow, ditches/ponds and extra hedgerows, utilising approximately 1.5 million tonnes of inert material. Nineteen considerations are listed for Ashley Manor Farm, for example the ecological and hydrological assessment of all watercourses, ditches and aquatic habitats will be required including an understanding of the hydrological regime.

4.6. A number of years ago the site was subject to a mineral planning inquiry and the appeal was dismissed. The site is subject to a current planning application to be determined by HCC as the Minerals and Waste Planning Authority (application number HCC/2022/0338). NFDC objected to the application in September 2022 on the basis that the site was not listed in the HMWP as a sand and gravel extraction site, and that there was inadequate assessment with regard to nearby listed buildings. The latest development considerations (page 170 of the HMWP) do make reference to restoration works and the respecting of listed features but no mention of the impact from extraction works on listed buildings.

4.7. Regarding biodiversity the site is relatively constraint free, though hydrological linkage to watercourses will need to be managed, as well as dust/emissions impacts on biodiversity, woodland and water courses to the south-east. The proposed development considerations require that hedgerows bounding the site should be

retained and enhanced wherever possible and any replacements required to be planted at an early stage of development.

- 4.8. In relation to transport impacts, the HCC Strategic Transport Assessment for the Minerals & Waste Plan states that in the current planning application it would operate under the cap of 150 HGV movements per day approved for Downton Manor Farm quarry, so the principal transport effect will be to relocate extraction activity 2.8km closer to the Caird Avenue processing facility. 150 trips are already permitted on the highway for Downton Manor Farm. Based on this information and with Ashley Manor Farm replacing the existing operations at Downton Manor Farm, HCC conclude that there is not expected to be any increase in trips over what is already permitted on the local highway. It would be helpful if the Development considerations (page 171) could clarify how the shift of HGV traffic from Downton Manor Farm to Ashley Manor Farm will be managed.
- 4.9. The development considerations now specify that a dust, noise and lighting management plan and monitoring is required. Any scheme must also appraise the impact on local business and amenity and well-being of residential properties and mitigate any adverse effects identified.
- 4.10. The condition of the landscape is good, and typical of the character area with a flat open landscape and linear woodlands encroaching on the boundaries. This open area of landscape forms an important part of the green belt keeping the rural landscape intact between the heavily populated communities along Hampshire's south coast. Crooked Lane running through the site forms an important landscape feature with double hedgerows along part of the route.
- 4.11. In addition, the Ashley Manor Farm site forms part of the proposed New Milton Green Loop (as adopted in its Neighbourhood Plan)².
- 4.12. **Proposed response to Ashley Manor Farm:**

Soundness: NFDC continues to hold concerns about this site allocation. The most substantial issues remain to be the impact on biodiversity from dust/emissions and the adverse landscape impacts. There are also potential noise effects from gravel extraction works adjacent to Milford Road Cemetery which could disturb the peace and tranquillity of the site. There have been previous sites in the New Forest District where prolonged issues with dust have adversely impacted nearby residents, but NFDC will work with HCC to lessen those impacts through the application process. Policy 20 (Appendix A) remains insufficient on the impacts on landscape and therefore fails the test of soundness under the 'justified' criterion.

There is also a question regarding the proposed Green Loop as adopted in the New Milton Neighbourhood Plan. It remains unclear whether an alternative green loop route has been offered by the site developer. The Regulation 19 updates do not address this element adequately and therefore Policy 20 (Appendix A) is considered unsound under the 'effective' criterion.

² https://www.newforest.gov.uk/media/2301/New-Milton-Neighbourhood-Plan-Made-Version/pdf/New_Milton_Neighbourhood_Plan_Made_Version_July_2021.pdf?m=63761338890670000

Modifications proposed:

NFDC would suggest that the Appendix A Development considerations include a requirement for clearly defined landscape buffers between the cemetery and residential properties around the periphery of the proposed site. This should include appropriate natural landscaping and planting regimes. This would provide satisfactory separation between the extraction works and local residents and cemetery visitors.

The development considerations in Appendix A with regard to Rights of Way should make reference to the Green Loop contained in Policy NM12 (and Appendix G) of the New Milton Neighbourhood Plan³ and that any site allocation must provide opportunities for an enhanced / alternative route that matches the vision for the Green Loop.

It would be helpful if the Transport Assessment referenced in Development considerations (page 171) clarified how the shift of HGV traffic from Downton Manor Farm to Ashley Manor Farm will be managed, including peak periods of rainfall when impacts from local flooding on traffic are most acute. A detailed Construction Traffic Management Plan that addresses these issues would be a suitable resolution.

Lastly, the Development considerations should also be clear about the need to appraise the impact of extraction work on listed buildings (not just the impact of restoration works on the listed status of buildings).

Midgham Farm, Hillbury Road, Alderholt (likely delivery 2024/25) – Policy 20

- 4.13. Currently open agricultural land, the proposed development would be for the extraction of sharp sand and gravel. The site could be viewed as an extension to the existing extraction site on land to the south, but the extent of the proposed site is much larger. Restoration would take the form of agricultural land at the existing levels (using imported inert materials) including nature conservation and increased permissive access.
- 4.14. The Minerals & Waste Plan states that a Transport Assessment must consider cumulative traffic impacts that take into account that the site is a continuation of the Bleak Hill site, which would cease prior to commencement at this site. The Strategic Transport Assessment supporting the Plan states that the expected number of additional HGV movements on any route on any one day would be relatively low, at 110 per day. As this would only represent an increase of 2.3% of HGV traffic or 0.2% of total vehicles on the corridor, this impact is considered by HCC to be negligible. In addition the planning considerations now require the provision of a new priority junction off Hillbury Road.

³ [New Milton Neighbourhood Plan - New Forest District Council](#)

- 4.15. Taking this into account, and the removal of previously proposed sites at Hamer Warren and Cobley Wood, previous NFDC concerns relating to unmanaged cumulative highway impacts in the wider area are now significantly lessened. Previous NFDC representations recommending that no HGV traffic is routed through Fordingbridge via the B3078 are also allayed now that more information has been set out in the Strategic Transport Assessment and development considerations. This includes the requirement for routing to be agreed which will take HGV traffic to the south of the site and thus away from Fordingbridge.
- 4.16. There is ecological interest due to the proximity of this site to the River Avon floodplain with complex habitats to the east and Ringwood Forest to the west. The site may provide supporting habitat to the SPA if birds are using it for high tide/roosting etc. In its previous response to the Regulation 18 draft Plan NFDC recommended that further studies were undertaken to consider this potential loss of habitat, backed up by adequate data, to inform future decisions about the appropriateness of this proposed allocation. This issue was also flagged in the NFDC Local Plan Habitats Regulations Assessment⁴. The southern margin needs to be protected and enhanced to maintain a strong connection between the two important areas of ecological interest. The Regulation 19 HMWP (Appendix A) now provides additional Development consideration (page 176) about the biodiversity impacts relating to qualifying bird species that need further appraisal regarding the associated SPA/Ramsar sites nearby.
- 4.17. NFDC concurs with the assessment that most of this site is of medium/good landscape quality. It is a farmed valley landscape, mainly pastoral, with a traditional field pattern surrounded by hedgerows with trees.

4.18. **Proposed Response to Midgham Farm site:**

This is a large area with the north-west corner in close proximity to the neighbouring settlement of Alderholt but the additional Development consideration requiring a buffer to the north-west corner and western edge addresses this point. The additional requirement for buffers with adjacent residential properties also provides reassurance on this issue.

Biodiversity impacts could be significant but the latest Development considerations are now clear that offsite roosting, foraging and breeding areas of the qualifying bird species of nearby SPAs/Ramsars will have to be appraised. In addition the requirement to enhance ecological networks as part of the restoration scheme is now clearer.

[Purple Haze, Verwood \(likely delivery 2024/25+\) – Policies 20 & 32](#)

- 4.19. The Purple Haze site is situated across the road from a previous sand and gravel site called Blue Haze which is now operating as a landfill site. Therefore the site could be viewed as an extension to the previous extraction site on adjoining land to the north even though it is split by the Verwood Road (the B3081). The site is subject to a

4

https://forms.newforest.gov.uk/ufs/form_docs/Policy/Submission%20Documents/SD04%20Habitats%20Regulations%20Assessment%20of%20New%20Forest%20District%20Local%20Plan%20Part%201%20June%202018.pdf?ufsReturnURL=https%3A%2F%2Fforms.newforest.gov.uk%2Fufs%2Fufsreturn%3Febz%3D2_1671627757294

planning application for the extraction of sand and gravel, submitted in March 2021. NFDC has raised no objection to the proposal subject to conditions relating to HGV movement restrictions, washing of HGVs, and noise limits relating to both excavation and restoration of the site.

- 4.20. It is currently a coniferous plantation, but the proposed use is for extraction of soft sand, sharp sand and gravel. Restoration measures would be inert fill to agreed levels. The site would eventually be used for a combination of deciduous woodland planting, heathland, nature conservation areas, enhanced recreational areas and public open space, linked to the Moors Valley Country Park.
- 4.21. It has been estimated that during the extraction operations there would be approximately 45 HGVs per day. Routing of the HGVs to the A31 would be along the B3081, which is deemed by HCC to be a suitable route for HGV traffic. The Strategic Transport Assessment concludes that the sensitivity of receptors along the preferred route will be negligible given that traffic will travel along routes of low sensitivity to traffic flows. NFDC does not disagree with that assessment and is satisfied that with the necessary junction improvements identified in the Strategic Transport Plan the overall impacts can be mitigated.
- 4.22. The updated development considerations (page 179) now specify a requirement for hydrological/ hydrogeological assessment in relation Ebblake Bog SSSI which addresses the previous response from NFDC on this issue at Regulation 18 stage. Likewise the plan is now clear that recreational displacement must also be carefully managed.
- 4.23. In relation to biodiversity, the ecological interest at the site is deemed significant, despite the relatively poor condition of the lowland heathland. The varied microclimates and proximity to much better habitat significantly increases its value. The viability of the site is dependent on the resolution of significant ecological issues which can only be achieved with suitable mitigation and compensation packages. The plan references the need to put in place management arrangements to secure short and long term objectives for amenity and biodiversity including heathland, woodland, acid grassland and protected species.
- 4.24. In terms of landscape the site is predominantly coniferous forest which is well maintained, but the landscape is judged to lack diversity and visual interest. The landscape condition is deemed moderate by HCC, and therefore adverse effects on this issue are deemed neutral.
- 4.25. The only outstanding concern is in relation to the potential adverse impact on the recreational use and enjoyment of the adjoining Moors Valley Country Park woodlands. A number of potential visitors to New Forest and Dorset sites are attracted to Moors Valley Country Park – this successfully diverts them from sensitive international nature conservation sites in the New Forest and Dorset heathlands. Mineral development in the vicinity of Moors Valley could reduce the attractiveness of the Country Park for recreation. This would potentially bring more visitors to both the New Forest designated sites and the Dorset sites. The updated Development considerations (page 179) now provide clear reference to the issue of recreational displacement as part of the protection of the Dorset and New Forest sites.

4.26. Proposed response to Purple Haze site:

NFDC is satisfied that the updated development considerations have addressed the majority of concerns previously held for this site allocation. There is a reasonable buffer from the nearest residential area. Ecological interest at the site is deemed significant, but there is also significant scope for restoration to provide woodland, heathland, nature conservation areas, enhanced recreational areas and links to the Moors Valley Country Park. Development considerations now specify a requirement for hydrological/ hydrogeological assessment in relation Ebblake Bog SSSI and NFDC is satisfied that this addresses the issue.

Other proposed responses

Once gravel has been extracted, many of the sites could be identified for nitrate mitigation, recreational mitigation or land for Biodiversity Net Gain, depending on current land use. This could be included, where appropriate, in the development considerations for each extraction site.

In its previous representations on the Regulation 18 NFDC suggested stronger controls on the location of anaerobic digesters near to water courses. The HWMP remains silent on this point. NFDC suggests that the HMWP could benefit from a stronger policy approach with regard to this issue, given the potential for spillages into sensitive water courses and the significant adverse effects this can have on ecological systems. As a minimum, paragraph 6.194 should be strengthened to reflect this point.

Concluding comments:

New Forest District Council does not raise any objections to the sites as set out in the Regulation 19 submission plan but has concerns about the Ashley Manor Farm site. A number of previous holding objections to Regulation 18 draft policies have been addressed relating to the in-combination transport impacts from proposed sites in the Harbridge / Midgham area through additional development considerations / updated strategic transport plan, together with the removal of some sites from the plan (namely Cobley Wood and Hamer Warren).

Previous concerns at Regulation 18 draft stage relating to the potential cumulative supply vastly exceeding the need identified in the HMWP have also been addressed. The removal of a number of proposed sites across the Hampshire area (including those of Yeatton Farm and Hamer Warren) means that demand can now be met from a smaller number of sites.

NFDC acknowledges that mineral resources can only be won where they exist, and the geography/geology of New Forest District means that the Plan Area is likely to have a role in meeting wider sub-regional needs. On balance NFDC supports the HWMP.

5. FINANCIAL IMPLICATIONS

5.1. None arising from this report.

6. CRIME & DISORDER, ENVIRONMENTAL AND EQUALITY & DIVERSITY IMPLICATIONS

6.1. None arising from this decision.

7. PORTFOLIO HOLDER ENDORSEMENT

I have agreed to the recommendation of this report.

Sign: Cllr Derek Tipp

Date: 22 February 2024

<p>For further information contact:</p> <p>Andrew Herring Planning Policy Officer 023 8028 5424 andrew.herring@nfdc.gov.uk</p>	<p>Background Papers</p> <p>Appendix 1 - 2021 NFDC Officer Response to Sustainability Appraisal</p> <p>Appendix 2 – 2023 NFDC Response to Regulation 18 HMWP consultation</p>
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Date on which notice given of this Decision – 22 February 2024

Last date for call in – 29 February 2024

From: Andrew Herring <andrew.herring@NFDC.gov.uk>
Sent on: Tuesday, July 13, 2021 6:02:50 PM
To: hmwp.consult@hants.gov.uk
CC: [REDACTED]
Subject: HMWP Partial Update - SA Scoping Report and SA Baseline Report
Urgent: High

Attachments: HMWP Partial Update SA Baseline Report June 2021.pdf (12.21 MB)

Dear HCC Colleagues

Thank you for consulting with New Forest District Council (NFDC) on the SA documentation.

The SA Baseline Report and Scoping Report provide a sound overview of the Hampshire context and issues at play.

During the preparation of the now adopted NFDC Local Plan Part One (2020) there was discussion at the examination relating to prior extraction on strategic sites. The SA documentation could usefully provide some commentary on the **balance required between identified housing need on the one hand and the objective for prior extraction (where viable) on the other**. This would aid Local Authorities in preparing future Local Plans and the need to deliver sustainable development that is also in line with the HMWP.

In addition, there are a few omissions that NFDC would like to draw to your attention in the HMWP SA Baseline Report:-

- Page 55 – With reference to the list of NFDC **strategic sites** – we note that SS2 & SS15 are omitted, and assume that this is because they either already have existing mineral extraction permissions that are due to be fully realised in the next few years or have been worked previously? (and therefore is not directly relevant to future HMWP strategies). With regard to SS11 & SS14 the omission is presumably based on there being no underlying minerals? The table on page 55 could benefit from explaining this to the reader for the sake of completeness.
- Page 81 – A **Strategic Flood Risk Assessment** was carried out for NFDC in 2018 but it is not listed in the table. The SFRA can be found on the council's evidence base for the Local Plan ([see website](#)).
- Page 87 – The New Forest **Landscape Character Assessment** (2000) is omitted from the table - this also can be found on the council's website ([Report](#) / [Map](#)).

Best Regards,

Andrew Herring
Planning Policy Officer
New Forest District Council
Tel: **023 8028 5471**

andrew.herring@nfdc.gov.uk

Sent by email to:

hmwp.consult@hants.gov.uk

My Ref: HCC Minerals & Waste Consultation
Your Ref:

Date: 30 January 2023

Dear Minerals and Waste Planning Team

**NEW FOREST DISTRICT COUNCIL RESPONSE TO THE HAMPSHIRE COUNTY COUNCIL
MINERALS AND WASTE PLAN: PARTIAL UPDATE – REGULATION 18 DRAFT PLAN
CONSULTATION**

Thank you for the opportunity to respond to the Minerals and Waste Plan Partial Update consultation.

Please find below the response of New Forest District Council (NFDC).

In July 2021 NFDC responded to a previous consultation by Hampshire County Council (HCC) on the preparatory stages of plan making, when HCC consulted on the Sustainability Appraisal (SA) Scoping Report and SA Baseline Report.

It is acknowledged that resources can only be won where they exist, and the geography/geology of New Forest District means that the New Forest Plan Area is likely to have a role in meeting wider sub-regional needs.

Development Management Policies

NFDC concur with the need for partial updates to reflect changes to the National Planning Policy Framework, National Planning Policy for Waste and in response to the previous consultation.

This Council is supportive of the need for an up-to-date evidence base in relation to the current levels of provision for minerals and waste facilities and has previously provided factual comments on the Sustainability Appraisal which sits alongside the draft Plan.

NFDC is particularly supportive of more detailed reference to Biodiversity Net Gain and the citing of air quality issues. The requirement for all applications to be accompanied by a Climate Change Assessment is especially welcomed following the NFDC declaration of a Climate Change and Nature Emergency in October 2021.

Mineral Policies

This Council is pleased to see reference in the supporting text to Policies 15 and 16 relating to the 2016 Safeguarding Supplementary Planning Document (SPD). Given that the Government is proposing that current SPDs will automatically cease to have effect at the point at which authorities are required to have a new-style plan in place, HCC should consider providing criteria on securing prior extraction of minerals (before the development of the site for other uses) in this HWMP update. There may be other elements in the SPD that would benefit from being inserted in this HMWP update. This approach would enable the HMWP itself to continue to inform Local Plan making as part of the overall Development Plan.

NFDC questions the basis for the aggregate requirement set out in the partial review. Paragraph 2.33 of the Minerals background paper (August 2022) sets out a shortfall of 2.17Mt (million tonnes) of aggregate. However, the plan goes on to propose a number of sites that in total are projected to provide nearly 12Mt of sharp sand and gravel. This appears to be significantly above the projected shortfall, and NFDC believes that this represents an excessive potential allocation of sites. Site specific comments on land within the New Forest District Plan Area are set out on subsequent pages.

In addition, economic forecasts set out in the evidence base (whilst they appear broadly sound and take into account the impact of the COVID-19 pandemic) are based on 2020 reports and the Local Aggregate Assessments (LAA), which both predicted growth in construction output in 2021 and 2022 and beyond. However, inflation and other factors have had an effect since 2020, and the quantum of demand for aggregates for 2023 and beyond is therefore questioned.

Waste policies

With regard to updated waste policies (Policies 25-33) this Council makes a general comment that the HWMP appears to reflect the latest levels of waste arising and plans positively to ensure forecasts for future waste capacity are maintained.

NFDC supports the stronger policy approach in relation to energy recovery and the requirement that energy recovery proposals provide combined heat and power as a minimum (Policy 28). NFDC would also advocate strong controls on the location of anaerobic digesters in relation to water courses, especially where slurry is stored. This is due to the well known nutrient pollution that can occur through accidental spills of slurry into watercourses. The HMWP should stipulate that all slurry pits and digester plants be enclosed with bunds to contain spills, and be sited well away from water courses.

Delivering the policies set out in the updated HMWP will compliment and add value to the delivery of New Forest District Council's new Waste Strategy ([Waste and recycling strategy - New Forest District Council](#)) which was adopted in the summer of 2022.

Other policies

It is regrettable that the Partial Review proposes to delete the previous Policy 14 (Community benefits). This took a positive approach to the potential implementation of mitigation measures which can bring benefits to the local community and it is not evident that suitable provisions have been proposed elsewhere in the Partial Review to ensure that lawful community benefits can be secured in future development. NFDC notes that the Partial Review sees mineral and waste

operations (sites) as temporary, but the Plan should retain the policy framework to negotiate positive outcomes where they present themselves.

Proposed Rail Depot allocation

Totton Sidings (Totton Station) – Policy 19

It appears that HGV movements will be required to facilitate the proposed use of the site as an aggregate depot - however no assessment of traffic generation from existing uses or future scenarios has been made available for scrutiny. In the absence of this information the District Council wish to note that this use could have significant impact on the highway network, nearby residential properties and on air quality and the general character of this part of the town centre.

In the absence of such information, there are concerns that the proposal could generate significant vehicle movements with associated impacts on this part of the town centre and the residents and businesses that occupy this area.

Proposed Mineral and Waste Sites

Yeatton Farm, Hordle – Policy 20

NFDC objects to the potential allocation of this site. There are a number of potential adverse impacts including loss of hedgerows, significant landscape impacts, and potential to encroach on the character of the adjoining settlement. In addition, the draft plan does not specify an access point; a number of the local lanes are very narrow.

NFDC draws to the attention of HCC that there is an allocated housing site (Policy SS8 – Land at Hordle Lane in the [New Forest Local Plan Part 1, adopted 2020](#)) for up to 160 homes immediately to the north of the proposed Yeatton Farm site. Proximity to present and future residential properties raises significant in-combination concerns. Given the excess of proposed mineral allocations relative to forecasted shortfall, NFDC question what purpose is served by allocating an environmentally challenged site that is not expected to deliver until the very end of the M&W Plan period.

Ashley Manor Farm, New Milton – Policy 20

NFDC has concerns about this site. The most substantial issue is landscape impact - this area was assessed in the most recent Local Plan as part of a Landscape Sensitivity Study and was judged to have high landscape sensitivity ¹. The proposed extraction of minerals from this site, both from the works themselves and the associated development needed to enable this, is likely to have a significant detrimental impact on this landscape. In addition HCC must ensure that any potential noise from gravel extraction works adjacent to Milford Road Cemetery would not disturb the peace and tranquillity of the cemetery. The development is also likely to have an adverse impact on the occupiers of nearby residential properties, by reason of noise and dust, which will need to be carefully considered.

There is also a significant question regarding the proposed Green Loop as adopted in the New Milton Neighbourhood Plan. It is not clear whether an alternative green loop route has been offered by the site developer, noting the existing public right of way at Crooked Lane.

It is noted that the potential biodiversity is low at the site.

¹ (newforest.gov.uk) New Milton Area 3: pages 129-133

Cobley Wood, Harbridge – Policy 20

Holding objection - this is a remote location but there are potentially significant cumulative impacts from other proposed mineral and waste sites in the area (Hamer Warren and Midgham Farm). In addition developers are currently promoting a major residential site on the Dorset side of the boundary which, if brought forward, could result in substantial in-combination effects relating to HGV and traffic movement. Impacts on biodiversity are identified in adjacent areas which could be mitigated, and detailed assessment for SPA impacts would be required.

Hamer Warren Quarry, Harbridge – Policy 29

This proposed use is compatible with the site and restoration measures have already been agreed in the current planning permission. However it is unclear whether this proposed allocation would have the effect of delaying the restoration of the site. If so, it would be regrettable for residents to experience an extended period of works and the likely impacts from an extended period of traffic movement.

This is a remote location but there are potentially significant cumulative impacts from other proposed mineral and waste sites in the area (Cobley Wood and Midgham Farm). In addition, developers are currently promoting a major residential site on the Dorset side of the boundary which, if brought forward, could result in substantial in combination effects relating to HGV and traffic movement.

Midgham Farm, Hillbury Road, Alderholt – Policy 20

Holding objection – this is a large site with the north-west corner in close proximity to a residential area. Biodiversity impacts could be significant; in particular grassland habitats that are likely to provide supporting habitat to the SPA for off-site foraging for protected bird species. Should this potential allocation be progressed, a landscape assessment should be undertaken to establish the most appropriate screening and/or long-term mitigation. It should also be ensured that no HGV traffic is routed through Fordingbridge via the B3038 as this road is sub-standard in width (single lane) through the town centre.

This is a remote location but there are potentially significant cumulative impacts from other proposed mineral and waste sites in the area (Cobley Wood and Hamer Warren). In addition developers are currently promoting a major residential site on the Dorset side of the boundary which, if brought forward, could result in substantial in combination effects relating to HGV and traffic movement.

Purple Haze, Verwood – Policies 20 & 32

NFDC has concerns about this site. There is a reasonable buffer from the nearest residential area. Ecological interest at the site is deemed significant, but there is also significant scope for restoration to provide woodland, heathland, nature conservation areas, enhanced recreational areas and links to the Moors Valley Country Park.

NFDC would flag up the potential adverse impact on the recreational use and enjoyment of the wider Moors Valley woodlands. A number of potential visitors to New Forest and Dorset sites are attracted to Moors Valley Country Park – this successfully diverts them from sensitive international nature conservation sites in the New Forest and Dorset heathlands. Minerals development in these part of the Moors Valley vicinity could reduce the attractiveness of the Country Park for recreation. This would potentially bring more visitors to both the New Forest designated sites and the Dorset sites. As such, the potential to mitigate this potential harm should be explored further.

The presence of Ebblake Bog SSSI adjacent to the site is a potentially significant constraint given the hydrological gradient that has brought about this peat mire . Such habitat is now internationally scarce and the relatively few remaining undamaged mires thus assume special nature conservation importance.

Concluding comments

New Forest District Council is concerned that the potential cumulative supply vastly exceeds the need identified in the Draft Plan. There are also questions relating to the in-combination transport impacts from proposed sites in the Harbridge / Midgham area, together with specific site concerns about impacts on residents in Hordle and New Milton.

Notwithstanding these concerns, NFDC would welcome the opportunity to discuss these representations further with the County Council and would also encourage greater collaboration and dialogue as the Plan develops.

Yours faithfully

Claire Upton-Brown

Claire Upton-Brown

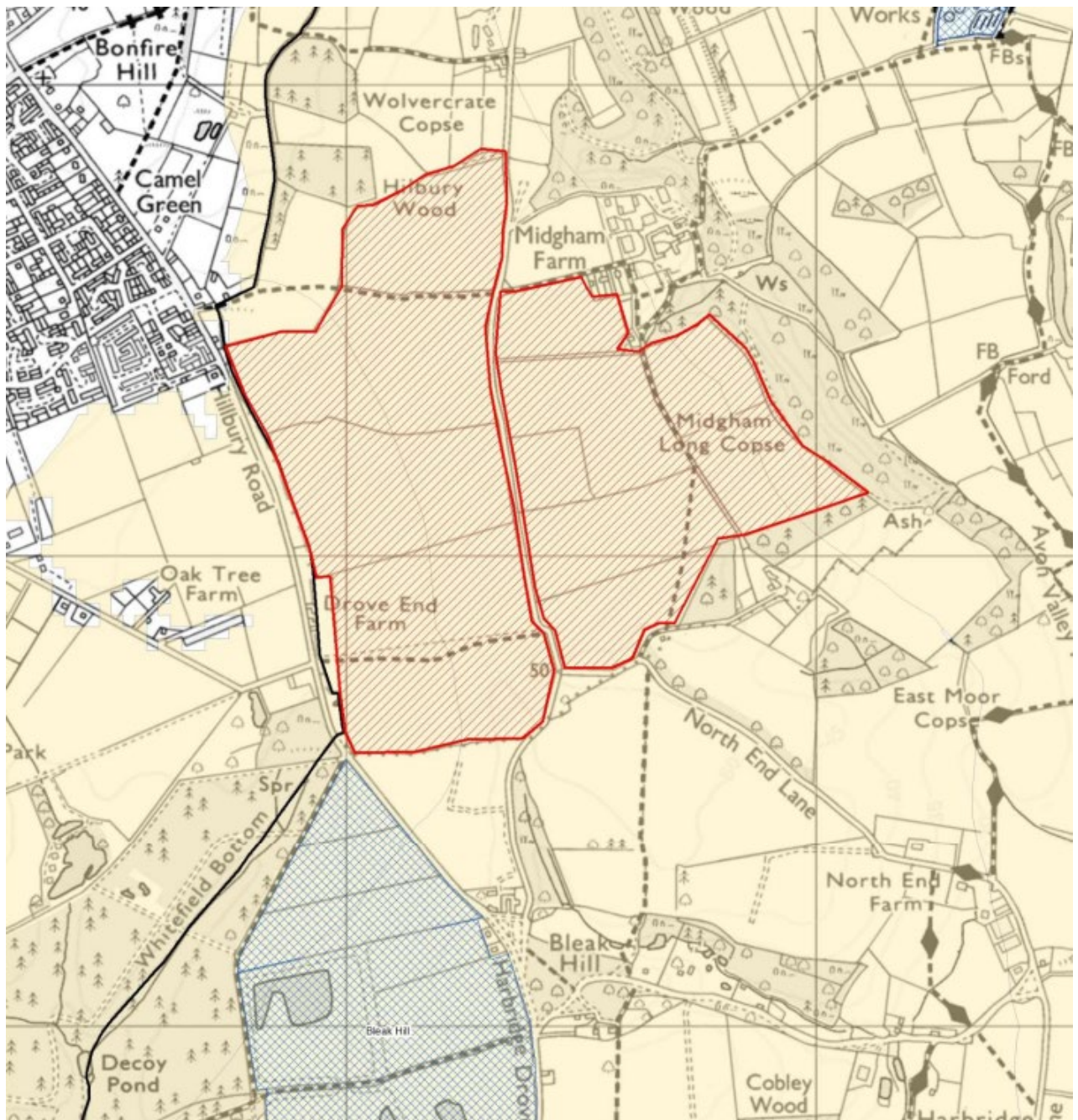
Executive Head for Planning, Regeneration and Economy

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Midgham Farm Site proposed allocation (edged red)

Existing Bleak Hill site in blue hatching



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 2023 Ordnance Survey [100019180]

From Appendix A of the HMWP Regulation 19 document -
<https://documents.hants.gov.uk/mineralsandwaste/HMWP-PartialUpdate-ProposedSubmissionPlanConsultationVersion-December2023.pdf>

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PORTFOLIO - ALL

PLACE AND SUSTAINABILITY OVERVIEW AND SCRUTINY PANEL - 7 MARCH 2024

SOLENT FREEPORT: SECURING A LEGACY FOR THE NEW FOREST

1. RECOMMENDATIONS

- 1.1 That the Panel provides comments to the Cabinet on the content of this report and supports the intended Cabinet recommendations, as follows.
 - i. That the Cabinet:
 - Agrees that the following represent the priorities for the New Forest in respect of the economic growth which would be achieved through a successfully delivered Solent Freeport.
 - Transport/wider infrastructure
 - Employment and Skills
 - Prosperous Communities
 - Environmental Sustainability
 - The Development of a Local Delivery Plan
 - Instruct officers to develop a New Forest Freeport Delivery Plan and bring it back to Cabinet for consideration.

2. PURPOSE OF THE REPORT

- 2.1 To update the Panel on delivery of the Solent Freeport and to seek support for a series of New Forest Freeport priorities and the principle of developing a New Forest Freeport Delivery Plan.

3. BACKGROUND

- 3.1 Cabinet, at its meeting of 3 February 2021, agreed to support the bid to Government for the creation of the Solent Freeport. Subsequently, Council, at its meeting of 19 July 2021, approved the submission of an Outline Business Case to Government further supporting the establishment of the Freeport. This included a tax site within the Council's Waterside area covering four landholdings – the former Fawley Power Station, Exxon Mobil, ABP's Strategic Land Reserve and Marchwood Port (Solent Gateway).
- 3.2 At its meeting of 21 March 2022, Cabinet agreed to delegate endorsement of the Freeport Full Business Case and Memorandum of Understanding to the Chief Executive and agreed the Freeport Business Rate Relief policy.
- 3.3 The Solent Freeport Full Business Case was submitted to government in April 2022 and was subsequently approved. The Freeport was officially designated and moved into delivery phase in December 2022.
- 3.4 The Solent Freeport Full Business Case set out that the initiative will unlock significant investment, create thousands of new jobs and enhance the region's credentials as a

global gateway into the UK. The incentives to support investment on tax sites are now in place, including business rates relief and other incentives to support capital investment. At the same time, business rates growth which results from that investment will be pooled and reinvested in the area.

- 3.5 Decisions in relation to the Freeport are made by the Solent Freeport Board. The Leader of New Forest District Council is a Board Member of the Freeport. A sub committee of the Freeport Board, the Finance, Resources and Audit Committee, considers issues around finance and governance. The Leader is also a Member of that Committee. Finally, the Retained Rates Investment Committee considers recommendations on the use of retained business rates. The S151 Officer of New Forest District Council sits on the sub committee.

4. NEW FOREST TAX SITES UPDATE

- 4.1 Tax sites give businesses operating within them access to certain tax benefits ie Enhanced Capital Allowances, Enhanced Structures and Buildings Allowance, Stamp Duty Land Tax reliefs, Employers National Insurance Contribution relief, and Business rate relief. On designation of the Freeport, these benefits were due to end in 2026 but the Chancellor's latest autumn statement extended that deadline, in principle, to 2032.

- 4.2 Tax sites within the New Forest will play a vital role in the delivery of the Freeport – with land at the former Fawley Power Station, Exxon Mobil, ABP's Strategic Land Reserve and Marchwood Port (Solent Gateway) making up the Southampton Waterside tax site, along with one additional site outside of the District boundary in Redbridge. In the Freeport Business Cases, these sites are forecast to contribute:

- 7,000 of 16,000 new jobs (44%)
- £290m of £511m retained business rates (57%)
- 303 ha of 430ha of developable land (70%)

- 4.3 With the Freeport now live, it is important that investment comes forward which will realise these benefits – the clock is ticking both in respect of the benefits for investors but also the period over which retained business rates will be realised.

- 4.4 The current position on each is as follows:

- **Former Fawley Power Station.** One of the biggest brownfield redevelopment schemes in the south of England which has a resolution to grant outline planning permission for a residential led mixed use scheme including approximately 10 hectares of land in the northern part of the site for business and industrial uses. The S106 which would finalise the planning consent has not been signed by the landowner/developer which makes the timing of development uncertain. New investors have come on board and there is a new management team. Initial discussions with that team have taken place and updated proposals are awaited.
- **Exxon Mobil** announced in November a major investment in a low sulphur diesel facility. The addition of a new hydrogen plant is seen as the foundation for developing a sustainable aviation fuel facility and, combined with their new Southampton to London pipeline, represents a near £1billion investment in the plant. The proposals will see development on one of the Freeport tax sites.
- **The Solent Gateway** initiative now comes under the ownership of the Association of British Ports (ABP) with development planned via the long lease

which they have at Marchwood Port. The site has indicative planning permission for the construction of hard standing for storage areas for the movement of materials, vehicles and containers as well as covered storage, warehousing, industrial space and offices. Subject to signing off on the planning conditions, Solent Gateway have indicated that they expect building to begin imminently, which will represent further investment on the tax site.

- **The ABP land reserve** site represents a later phase of development. ABP have indicated that its development is reliant on improvements to the A326. A planning application for the A326 upgrade is expected later in the year, the project being led by Hampshire County Council as the Highways authority. Details of what is proposed at the land reserve is still awaited – however, the Freeport Business Case identifies the use of land as being key to unlocking an overall 40% increase in capacity at the Port of Southampton, retaining the Solent as a globally important trading gateway.

5. RETAINED BUSINESS RATES

- 5.1 One key benefit of the Freeport is the retention of business rates above a fixed base level on tax sites for a period of 25 years from Freeport designation.
- 5.2 The local retention of incremental business rates generated on tax sites is considered by government to be one of the most valuable elements of the Freeports package. Retained business rates over a 25-year period will provide a major resource for initiatives across the Solent.
- 5.3 Portsmouth City Council, as the Accountable Body for the Freeport, has signed a Memorandum of Understanding (MoU) with the Department of Levelling Up, Housing and Communities (DLUHC) in relation to the use of retained business rates. The MoU required the establishment of a Solent Freeport Company Limited (SFCL) Investment Committee to make decisions on the use of retained business rates. The Investment Committee is to make decisions based on deliverability, value for money, strategic fit, additionality, private sector leverage, public sector contributions, affordability and contribution to delivering strategic outcomes across the whole geography of the Freeport.
- 5.4 The Solent Freeport has approved a Retained Rates Investment Plan which establishes that, once pooled, retained business rates will be re-invested on the following basis.
- Skills – 15% of available funding
 - Net Zero – 7.5%
 - Hotbeds of innovation – 7.5%
 - Regeneration and enabling infrastructure – 60%
 - Local investment priorities – 10%
- 5.5 At this stage, this breakdown must be considered as indicative. Further information is awaited on whether some areas of focus will take priority as business rates are accumulated. The timing of when funds will be available is also not yet clear. If funds are only approved once they are received then it may be some time in the future before they are available for projects. However, if there is a desire for the Freeport (or its accountable body or other body) to borrow based on future business rate income, then projects may proceed much more quickly. What the above breakdown does do, is give a clear indication of the priorities of the Freeport – this will be important when

considering the New Forest's priorities as greater alignment between the two will improve the prospect of future funding.

6. NEW FOREST FREEPORT PRIORITIES

- 6.1 The Solent Freeport offers a once in a generation opportunity to realise inclusive growth across the region including the New Forest. To date, the New Forest has not progressed proposals for how it would like to see retained business rates re-invested in the region. Whilst retained rates will be pooled and used collectively across the area, tax sites within the New Forest will be contributing a significant proportion of these funds – it is therefore appropriate that we look to influence how they are utilised and ensure that New Forest residents see significant benefit from the Freeport over the years ahead. A Delivery Plan is required which establishes the outcomes that a successful Freeport would deliver in the New Forest. This Delivery Plan can then form the basis for discussions with Freeport on use of business rates and other funding opportunities as they come forward.
- 6.2 Both the Future New Forest Partnership Board and the Waterside Steering Group has considered what they believe the most appropriate Freeport priorities would be. Each of those groups agreed that the priorities to be developed into a New Forest Freeport Delivery Plan should be as follows:
- Transport/wider infrastructure
 - Employment and Skills
 - Prosperous Communities
 - Environmental Sustainability
 - The Development of a Local Delivery Plan
- 6.3 It is now appropriate for Cabinet to consider whether it agrees that these are the key priorities for the District and for this Panel to provide its comments as part of that consideration. Further information is provided on each below.

Transport/wider infrastructure

- 6.4 The transport asks of the Freeport will need to be considered through a combination of the adopted Waterside Transport Strategy, enabling infrastructure required for New Forest Freeport tax sites (most notably the A326 upgrade) and the need to realise an enhancement of our environment and the National Park. The Waterside Transport Strategy identifies the following vision.

The Waterside will have a low carbon, resilient and fully integrated transport network designed around people and communities, enabling economic growth in an innovative way whilst protecting and enhancing health, quality of life and the surrounding internationally important environment.

It will provide for a prosperous community within which people can live, work and have easy access to local facilities, whilst enjoying easy, direct and affordable access to:

- *The New Forest's unique environment;*
- *Southampton Water's unique deep-water harbour, leisure activities and habitats;*
and
- *The city of Southampton's wide-ranging employment, leisure, health and education facilities.*

- 6.5 Implementation of the Waterside Transport Strategy should be a key Freeport priority for the New Forest. The Strategy sets the wider framework for investing in transport to support delivery of the Freeport and wider growth.
- 6.6 In relation to unlocking Freeport tax sites, the key single piece of infrastructure which has been identified as a fundamental pre-requisite to investment is the upgrade of the A326.
- 6.7 Hampshire County Council (HCC), as the highways authority, has identified that the scheme will deliver increased capacity and a redistribution of traffic back on to the A326 and away from other less suitable routes, such as through the National Park and Waterside communities. In addition, it will realise improvements for people walking and cycling in the Waterside communities and deliver a minimum 10% improvement in biodiversity, through both mitigating the impacts of the scheme and providing a further 10% uplift.
- 6.8 HCC has indicated that, as part of the Large Local Majors (LLM) programme, the DfT could be expected to provide up to 85% of the costs of constructing the scheme, and are providing up to two thirds of the cost of developing the scheme up to the submission of the Planning Application. The remaining 15% of construction costs are still to be confirmed. The cost of the preferred option at Strategic Business Case stage was £85m, but with recent inflationary price increases, the construction cost is now expected to be above £100m. In January 2024, the Leader of Hampshire County Council approved a decision to progress the continued development of the A326 scheme up to planning application and outline business case submission planned for autumn this year.
- 6.9 A number of tax site landowners have indicated that congestion on the existing A326 is a barrier to operation and an upgrade is crucial to delivering the growth envisaged by the Solent Freeport.
- 6.10 Implementation of the Waterside Transport Strategy should therefore be a core priority – including not just road infrastructure but also our ambition to realise a renewed Waterside rail link as well as wide ranging cycling and walking improvements. However, a focus on infrastructure will need to go beyond transport. In particular, the New Forest is challenged by threats to the necessary energy supply. Any New Forest Freeport Delivery Plan should consider the wider infrastructure requirements which will be key to the Freeport's success.

Employment and Skills

- 6.11 The Solent Freeport Full Business case references the Skills Action Plan and the Local Skills report developed by the Solent Skills Advisory Panel (SAP). The SAP plans show skills gaps at higher technical levels and across specific sectors, the need for more digital skills, a focus on STEM and creating additional opportunities for apprenticeships.
- 6.12 In terms of delivery on tax sites, the Freeport FBC suggests that skills needed are likely to be STEM higher technical skills, complex engineering, digital and data analytics.
- 6.13 In relation to skills, Freeport priorities as set out in the Full Business Case included:
- Creating pathways to jobs for local people.

- Targeted skills initiatives to expand the existing offer and address specific skills requirements.
- A Freeport Skills Charter to lever private sector contributions.
- A Solent Freeport Green Growth institute.
- A Skills Academy at Fawley Waterside – focusing on apprenticeships, upskilling and skills transfer across generations.
- Schemes at Southampton airport (aeronautical), Arlington (rail engineering), Dunsbury Park (advanced manufacturing).
- Utilising existing national government training offers.
- Reaching those in the most deprived communities.

6.14 Across the Solent region, there is a range of provision which New Forest residents potentially have access to in relation to skills – including boot camps, apprenticeships, NEET engagement, a skills hub and a construction skills programme. The County has a network of post 16 education and skills providers. Programmes include Hampshire Careers Partnership, Hampshire Careers and Employability Service, Careers and Enterprise Company, Employment and Skills Hub, Apprenticeships (Solent Apprenticeship Hub), Construction Skills Fund, Outdoor Education and Duke of Edinburgh Award.

6.15 However, the New Forest Economic Profile (2022) highlights some key characteristics in the district and, in particular, some areas where our employment and skills profile departs significantly from the regional average. This includes:

- An increasingly aging population (30% over 65 compared to 19% nationally).
- Knowledge intensive employment and skills (where knowledge and technologies are used extensively to add value to production or services) are underrepresented in the New Forest -11.4% compared to 20.6% in Hampshire.
- A higher economic inactivity rate (20.6%) than across the County as a whole (17.6%).
- Overall affluence (and perception of affluence) hiding pockets of deprivation – for example, in Totton, New Milton, Blackfield, Pennington. Totton and New Forest Waterside fall within 10% and 20% most deprived on the criteria of education, skills and training.
- Twice the proportion of people in the New Forest work in low skilled occupations compared to the Hampshire average.
- In relation to advanced skills (above A level), 37% of working age population of the New Forest have advanced skills compared to 43.5% nationally. There are parts of the district where the figure is much lower.
- In terms of those with low or no skills (ie either no formal qualification or level 1, GCSE 1-3 or NVQ1), the figure for the New Forest is 19.7% compared to 17.1% in Hampshire.
- New Forest has 21,600 residents employed in high skilled occupations, 28.2% of the working age population. The figure for Hampshire is 34.9%.
- The New Forest outperforms Hampshire and the UK for on-the-job training.

6.16 Discussions with providers and businesses suggest that there are a number of areas which are unique to the New Forest and, as such, they are not addressed by the Local Skills Infrastructure Plan and the Skills Action Plan which are documents reflecting the regional need. This includes:

- We have isolated communities where those most excluded have additional challenges because of that isolation.
- A very high proportion of our businesses are small and medium enterprises (SMEs). This has an impact on apprenticeship and T Level take up as SMEs are less likely to employ staff through this route.
- Additionally, SMEs tend to be less nimble in terms of recruitment, so we lose skilled New Forest residents to employers elsewhere.
- We have a need for high numbers of short-term contractors – and we are not attractive to that market because of the cost of staying and living in the New Forest.

6.17 It is therefore essential that a New Forest Freeport Delivery Plan makes the case for bespoke employment and skills approaches which address our unique challenges.

Prosperous Communities

6.18 The Solent Freeport Full Business case puts Southampton Water tax sites at the heart of the region's economic growth. The business case predominantly focuses on key deliverables around jobs, skills, innovation, and net zero. However, there is perhaps a lack of focus on supporting local communities within and adjacent to where growth is expected to take place.

6.19 One test of a successful Freeport should arguably be – 'has it made your community a better place to live'? We have many communities who are likely to assess the success of the Freeport on the physical and social benefits which will be achieved where they live – in Totton, Marchwood, Hythe, Fawley and Calshot for example. More widely, in supporting the Freeport proposal, the Council made strong representation that there should be an element of the retained business rates, the use of which would be determined by local need. This was done to ensure that communities across our whole district see benefits from the initiative and it is important that we follow through on that principle.

6.20 Totton is an important example of this and an area where we have been able to make quick strides in terms of considering how the Freeport could benefit the town centre through engagement work previously undertaken. Totton town centre needs investment through a long-term plan. The Council spoke to residents last year about how the town centre could be improved both in relation to physical interventions to enhance the town centre, but more widely to consider strategic land uses and connectivity. Cabinet subsequently agreed design principles for the town. Work is needed to bring partners together to consider a vision for Totton and an approach to realising that vision, potentially through a Framework Masterplan and Investment Plan. The Totton Regeneration Partnership is now in place to progress this work. An element of our Shared Prosperity Fund has also been earmarked, allowing some 'quick wins' to realise momentum in transforming the town centre.

6.21 The Council has additionally invested additional small sums in other town centres across the district to begin the process of engagement with local people about what would improve the places they live. Supporting local communities and town centres is also a key theme in our emerging Corporate Plan. However, where town centres across the country have benefited from investment through the Levelling Up agenda our town centres have no current route to major investment. Our Communities team will work with the Freeport going forward to look at the options open to us to address that and to bring further investment into the district. In delivering the Freeport, it is

important that the aspirations of the Freeport Full Business Case are broadened to realise inclusive growth for communities across the whole district.

Environmental Sustainability and Working Towards a Net Zero Economy

- 6.22 The Solent Freeport is unique in being the only Freeport with tax sites lying adjacent to a designated National Park and which includes land within the National Park. This creates an immediate challenge in balancing the benefits of inclusive economic growth with the need to enhance the Park as an inclusive landscape for all to enjoy.
- 6.23 The speed at which Freeport proposals across the country were developed, including outline and full business cases, meant that this issue of balancing growth and environment could not be fully assessed, albeit progress towards net zero in general was at the heart of the Freeport guidance and bidding process.
- 6.24 Any delivery plan for the New Forest in relation to the Freeport will need to consider both the role of the Freeport in progressing the region's move towards net zero alongside a focus on wider environmental enhancement and sustainability, reflecting the area's very significant natural assets.
- 6.25 Work in relation to net zero in the New Forest includes activity being undertaken by the Freeport itself, the Solent Cluster on Decarbonisation, individual major businesses and NFDC's own action plan both for the Council and the wider District.
- 6.26 In addition to ensuring progression towards net zero, a successful Freeport should see a significant enhancement of our National Park offer but also connectivity between our Waterside communities and the Park itself.
- 6.27 Specifically in terms of Freeport outcomes, the Park Authority has established the following as priorities:
- New extensive country park and greenspace provision that is accessible to local communities and enhances natural capital;
 - Reconnecting the Forest to the sea through ecological corridors, and reducing severance between Waterside communities and the New Forest;
 - Connected active travel / sustainable transport network that provide safe and green alternatives to the congested road network.

Local Delivery Plan Projects

- 6.28 In the development of the Freeport proposals, New Forest District made representation that an element of re-use of retained business rates should support local projects in those areas where rates will be collected. This was done to ensure that all parts of the New Forest realise benefits from the Freeport. An early priority for a New Forest Delivery Plan will be to develop an approach to identifying a wide range of such projects. This could be done through a bidding process or a strategic commissioning approach or both but should allow all our communities to propose projects which would support their areas.

7. COMMUNICATIONS AND ENGAGEMENT

- 7.1 The process for bidding for Freeport status across the country and subsequently developing and signing off business cases took place over a very short period and did not include provision for major engagement and consultation. One consequence of this, is a potential lack of understanding locally of the Freeport initiative or the

opportunities it could bring to communities across the district. It is also important that we hear any concerns that local people may have about its implementation.

- 7.2 In developing the priorities for the New Forest, it will be important to engage with local communities to address that shortfall in communication. The Council will work with the wider Freeport stakeholders to ensure that such discussions, for example with parish councils, take place alongside the development of a local Freeport Delivery Plan.

8. CONCLUSIONS

- 8.1 Given the role of New Forest tax sites to a successful Freeport, it is vital that the benefits of the Freeport are felt by our residents. The Panel is therefore asked to endorse the priorities set out in this report and support the recommendation to Cabinet that officers be instructed to develop a New Forest Freeport Delivery Plan.

9. CONSULTATIONS

- 9.1 The New Forest Freeport priorities set out above have been considered and endorsed by both the Future New Forest Partnership and the Waterside Steering Group.

10. FINANCIAL IMPLICATIONS

- 10.1 This report seeks support from the Panel for a recommendation to Cabinet to instruct officers to prepare a delivery plan setting out our approach to realising benefit within the New Forest from the Freeport initiative. This delivery plan can be progressed through the existing staff structure and we have received some additional resources through the government's Planning Skills Fund. We are also in discussion with the Freeport around releasing funding to work up a programme of local delivery projects and to develop business cases to support our proposals which will be needed to meet government requirements in relation to Freeport expenditure. Activities proposed within the delivery plan will need to demonstrate how they can be funded either through current funding commitments or through attracting additional external funding.

11. CRIME & DISORDER IMPLICATIONS

- 11.1 None.

12. ENVIRONMENTAL IMPLICATIONS

- 12.1 Ensuring that we realise environmental sustainability and an enhanced National Park through Freeport activity is one of the core priorities of the proposed New Forest Freeport Delivery Plan. As such, the work proposed should contribute positively to our environment.

13. EQUALITY & DIVERSITY IMPLICATIONS

- 13.1 The New Forest Freeport Delivery Plan looks to extend the proposals within the Solent Full Business case to realise specific interventions around employment, skills and communities, focusing on those most in need and communities in need of investment. As such, the Plan will champion equality and diversity across its core themes.

14. DATA PROTECTION IMPLICATIONS

- 14.1 None.

15. PORTFOLIO HOLDER COMMENTS

(Required for reports to the Cabinet)

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Background Papers:

Cabinet 3 March 2021: Freeports Bid
Council 19 July 2021: Solent Freeport Consortium
Ltd
Cabinet 21 March 2022: Solent Freeport

PLACE & SUSTAINABILITY OVERVIEW & SCRUTINY PANEL – 7 MARCH 2024

CABINET – 3 APRIL 2024

PORTFOLIO: PLANNING AND ECONOMY

SUPPLEMENTARY PLANNING DOCUMENT: PLANNING FOR CLIMATE CHANGE

1. RECOMMENDATIONS

- 1.1 That the Panel provides comments to the Cabinet on the content on this report, and supports the intended Cabinet recommendations, as follows:
 - i. That the Cabinet agrees:
 - a) The draft responses to representations (attached at Annex 1 to this report);
 - b) That the revised Supplementary Planning Document (SPD) “Planning for Climate Change” (attached at Annex 2 to this report) is formally adopted and published on the Council’s website;
 - c) That the revised SPD is taken into account as a material consideration in the determination of all relevant applications that are submitted after the date of adoption; and
 - d) That any final editorial changes to the document prior to publication be agreed by the Strategic Director of Place, Operations and Sustainability in consultation with the Portfolio Holder for Planning and Economy.

2. PURPOSE AND OBJECTIVES

- 2.1 The purpose of this report is to seek approval to adopt the supplementary planning document (SPD) Planning for Climate Change, following public consultation and consequential changes to the document.
- 2.2 The SPD will be used in the determination of planning applications for the construction of new homes, commercial and community buildings. The SPD provides guidance on the interpretation and implementation of policies in the adopted Local Plan 2016-2036 Part 1: Planning Strategy. In particular, parts of Policies STR1: Achieving sustainable development and ENV3: Design quality and local distinctiveness. Taken together these policies require that new development is future-proofed for climate change and incorporates design measures that improve resource efficiency, climate change resilience and reduce environmental impacts.
- 2.3 The key objectives of this SPD are to encourage the development industry to take all reasonable steps to minimise expected carbon emissions when designing and constructing new buildings, and to make new development more sustainable and climate change adapted. A ‘future homes now’ commitment not to install gas or oil-fired boilers in new development is a priority objective.
- 2.4 More detailed climate change policies and standards will continue to be developed through the Local Plan Review, and/or as national policy evolves.

3. NATIONAL AND CORPORATE CONTEXT

- 3.1 On 11 October 2021 New Forest District Council declared a Climate and Nature Emergency. The Climate and Nature Emergency declaration reflects the Climate Change Act 2008 (as amended 2019), which commits the UK government by law to reducing greenhouse gas emissions by at least 100% of 1990 levels by 2050. In 2021 the UK committed a 'world leading' 78% reduction target by 2035, set out in the Climate Change Committee's Sixth Carbon Budget.
- 3.2 The Planning for Climate Change SPD sits in the context of the National Planning Policy Framework (NPPF 2021). Pursuant to the Climate Change Act, this sets out that the overarching environmental objectives of the planning system include 'using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy'¹.
- 3.3 This SPD is part of the wider set of actions previously agreed by the Council to deliver on the Declaration, outlined in a Climate and Nature Emergency Action Plan². It also responds to both the Community Matters Corporate Plan 2020-2024³ commitment to 'ensuring sustainability is at the centre of our decisions to preserve resources and the environment for future generations', and the emerging draft Corporate Plan 2024-2028⁴ and its priority of 'protecting our climate, coast and natural world'
- 3.4 The SPD focuses on new development. Taking new homes as an example, a representative 3-bed terraced house built in the last decade consumes 124 KWh of energy per square meter per annum, of which 95 KWh as gas, and emits about 2 tonnes of CO₂ per annum from gas consumption alone (mostly for water and space heating)⁵. Best practice energy efficient homes consume around 15 KWh/m²/year for heating, do not use gas (or oil) boilers, and are carbon neutral in operation if their electricity is provided from renewable or nuclear sources.
- 3.5 To put a dwelling figure in context, of the New Forest district carbon dioxide emissions that are within the scope of influence of local authorities, 25% of these emissions in 2020 arose from natural gas use - 20% from domestic heating and 5% from commercial and other uses⁶.
- 3.6 The SPD complements the Council's Greener Housing Strategy⁷ which addresses decarbonising the Council's own affordable house building programme and affordable housing stock and working with private owners and landlords to help decarbonise existing homes. As part of the Greener Housing Strategy, it is intended that new affordable housing schemes designed and built by the Council will be constructed to the draft Future Homes standard⁸.

¹ NPPF paragraph 8

² [Climate change - New Forest District Council](#)

³ [Corporate_plan_17.11.21.pdf \(newforest.gov.uk\)](#)

⁴ [Corporate_Plan_2024_-2028_Consultation_Draft_Cabinet_1.pdf \(newforest.gov.uk\)](#)

⁵ [Energy consumption in new domestic buildings 2015 to 2017](#), BEIS 2019, and [Greenhouse gas reporting: conversion factors](#), BEIS 2021. Based on an EPC B-rated new build home with a gas boiler in 2017, sample size 93,967 homes.

⁶ [UK local authority and regional greenhouse gas emissions national statistics](#), 2020 data (ONS 2022)

⁷ [Greener Housing Strategy](#), Item 11, Cabinet report 6 July 2022

⁸ The future Homes Standard sets out envisaged changes to the Building Regulations proposed to come into effect in 2025, including 75-80% lower CO₂ emissions than 2020 standards, and a proposed ban on the installation of gas boilers in new homes.

4. THE REVISED PLANNING FOR CLIMATE CHANGE SPD DOCUMENT

- 4.1 Consultation on the draft SPD took place between 23rd May and 11th July 2023. There were 32 respondents to the consultation which can be broadly categorised as follows:
- 14 residents/individuals
 - 8 developers/planning agents
 - 3 town/parish councils
 - 3 national organisations (government agencies)
 - 3 local organisations
 - 1 utility company.
- 4.2 There were several respondents who felt that the SPD does not go far enough and more stringent standards should be rigorously imposed. Some respondents from the development industry consider that the SPD will be overly bureaucratic and an additional burden on those trying to bring forward development. The representations are set out at Annex 1 to this report, with a recommended response.
- 4.3 Whilst the SPD will provide the context for the provision of further information from developers to enable consideration of whether development will comply with policies STR1 and ENV3, members should note that it is not possible to introduce new requirements or development standards without progressing those policies through a local plan review. The SPD seeks to strike a balance between highlighting and promoting best practice and ensuring that additional burdens or costs that could make development unviable are not made requirements as a result of the content of the SPD.
- 4.4 A summary of all the representations received, with proposed responses to the matters raised is set out at Annex 1 of this report. The response to representations has informed the changes to the SPD. If members wish to change the recommended responses there may need to be consequential changes to the SPD (or vice versa).
- 4.5 The revised SPD document is attached at Annex 2. These revisions have been prepared in discussion with officers in the Council, including the Development Management Team and the Climate Change Manager. Please note that the document is just going through a final internal officer review, and any subsequent changes to the SPD document will be report verbally to the Overview & Scrutiny Panel at the meeting. The main changes to the document are as follows.

Part A

- **Focus on new buildings rather than retrofit** - – clarification that the focus of the SPD is on new buildings and masterplanning new development, rather than retrofitting existing buildings. The document now signposts the Council's Greener Housing Strategy and Historic England's advice on retrofitting historic buildings in its Climate Change Strategy.
- **Explaining choices in balancing competing considerations** - The document also now highlights that where there is potential conflict between the need to respect local distinctiveness or heritage issues in design terms, and the need to address climate change through design, the developer's preferred approach and its justification should be articulated in the design and access statement and the climate change statement.

- **References** - A reference to the Cranborne Chase AONB Management Plan has been added.

Part B

- **Scope of SPD** – clarification that the guidance on what needs to be submitted with a planning application refers to new buildings and that it is not applicable to applications for changes of use, retrofitting existing buildings or householder applications. Clarification has been added that SUDS are applicable to minor as well as major development.
- **Influence of SPD** - Text has been added to make it clear that it is unlikely that planning applications will be refused if the development fails to meet the best practice standards set out in the SPD. It is important to note that additional standards or policy requirements cannot be added through an SPD which can only provide guidance on the implementation of adopted local plan policies STR1 and ENV3. The information provided will allow the developer to articulate their case as to how their development meets these policies.
- **Aiding applicants** - Responding to representations that the SPD will require an overly bureaucratic burden on applicants which could delay development from coming forward, the SPD has been amended to include a proforma to assist with providing relevant information in a consistent format. This will hopefully provide further clarity for applicants and reduce the prospect of insufficient information being provided in support of the application.

Part C

- **Net Zero Carbon Toolkit** - This section is derived from the Net Zero Carbon Toolkit, updated for NFDC circumstance. There have therefore been limited changes to this section. However, text has been added to include a reference to the potential use of modern methods of construction to reduce embodied carbon on buildings. Text has also been added to reference smart controls and energy storage which enable energy to be consumed, retained and released according to specific energy demands.
- **Referencing** - References have been added to nature-based solutions in the 'Supporting ecology and biodiversity' section. The guidance in Natural England's report 'Carbon Storage and Sequestration by Habitat 2021' is signposted, as are the Partnership for South Hampshire's 'Green Infrastructure Strategy' and 'Green Infrastructure Implementation Plan'. Whilst these documents all contain information relevant to climate change mitigation and adaption, it is considered appropriate to sign post the information rather than repeat or try to summarise it in the Climate Change SPD.

5. NEXT STEPS

- 5.1 After any final editing, the SPD will be published on the Council's website as both a downloadable document and also reformatted as a web-version, alongside the adoption statement. Training for planning officers and elected members will be provided.
- 5.2 Most new planning policy documents are applied to the determination of all applications from the point of adoption. However, in this case it is intended that the best practice highlighted within the SPD should inform an iterative design process and will be a particularly important aspect of pre-application discussion and advice. There would also be the need to seek further information for current applications. The

specific circumstances applying to this SPD mean that it is recommended that it be applied as a material consideration to all applications submitted after the adoption of the SPD.

6. FINANCIAL IMPLICATIONS

- 6.1 There are no direct financial implications for the Council. However, development viability may be affected as the achievement of more energy efficient and environmentally sustainable buildings may impact on development costs whilst supply chains and processes transition to higher standards and expectations. Equally development with lower energy running costs and improved environmental credentials is likely to be more attractive to occupiers and may command a price premium.

7. ENVIRONMENTAL IMPLICATIONS

- 7.1 The Supplementary Planning Document sets out proposals which aim to ensure that new development:
- Reduces its impact on the environment by reducing greenhouse gas emissions that contribute to climate change; and
 - Is resilient to the projected future effects of climate change on the environment.

8. CRIME & DISORDER, EQUALITY & DIVERSITY AND DATA PROTECTION IMPLICATIONS

- 8.1 There are none.

9. PORTFOLIO HOLDER COMMENTS

(Required for reports to the Cabinet)

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Background Papers:

Annex 1 – Consultation Summary & Proposed Responses

Annex 2 - Revised Supplementary Planning Document (SPD) "Planning for Climate Change"

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CLIMATE CHANGE SPD CONSULTATION SUMMARY & PROPOSED RESPONSES

Respondents

Respondent and reference number	Respondent and reference number
01 VOID	23 VOID
02 VOID	24 M Smith
03 VOID	25 T Phillips
04 VOID	26 A Lawton
05 A Ford	27 Bargate Homes
06 VOID	28 Barratt David Wilson Homes
07 Wings Wildlife Heritage	29 Historic England
08 P Thomas	30 Stoford Developments
09 R Palmer	31 Persimmon Homes
10 Chapman Lilley Planning	32 McCarthy Stone
11 S Tonkin	33 New Milton Town Council
12 B Lord	34 New Forest Friends of the Earth
13 A Witt	35 Ringwood Town Council
14 A Elliott	36 VOID duplicates 20 Bloor Homes (Southern)
15 L Tonkin	37 Hordle Parish Council
16 VOID	38 National Highways
17 Southern Water	39 Fiddlesticks Farm
18 D Orme	40 Coal Authority
19 New Forest East Constituency Labour Party	41 L Everitt
20 Bloor Homes (Southern)	42 P Stickley
21 R Kent	43 Natural England
22 M Humber	44 Cranborne Chase AONB

VOID responses were either online responses started but left incomplete, duplicated responses or responses invalidated as they lacked a respondent name or address.

Summary of responses

CC SPD Purpose and objectives

Q1. What are your views on the main aims of the CC SPD as summarised in paragraph 2-3? (Section A provides general context, including on the role of the planning system).

Views on the main objectives ranged from ‘insufficiently ambitious’ (most individual respondents) to ‘laudable but unduly onerous’, including viability implications (some development interests).
 Amongst some development interests a common theme was that carbon, energy efficiency and other climate related matters should be left to National Building Regulations and any forthcoming national planning standards, rather than creating more burdens at planning application stage, especially as their planned evolution could render much of the draft SPD out-of-date. Encouragingly some developer responses were more supportive and described positive and forward-looking approaches they were already working on or delivering, whilst noting the need for some flexibility – which the draft SPD ‘best endeavours’ approach enables.
 NE commented that the SPD could be much stronger in recognising and requiring the role of the natural environment in tackling climate change

60

From	Representations	NFDC Response
05 A Ford	Lacks protection for green belt land and wildflower meadows or habitats from development.	These matters are covered by existing national and local plan policies and are outside of the scope of the SPD
09 R Palmer	"Zero carbon ready" cannot be used as a get out clause to not undertake necessary steps to decarbonise new developments. There should be a target date after which all new developments should be zero carbon to give clear direction and an aim for the council.	Comment noted – whilst it is considered appropriate to require a climate change statement, it would not be within the bounds of current government guidance or the adopted local plan policy to require zero carbon development.
10 Chapman Lilley Planning	The aims and objectives of the draft SPD are laudable but onerous and place yet more burdens upon applicants - at a time when financial constraints have consistently increased across the sector. The requirements, both in terms of resource and the financial implications of these extra reports (someone's got to pay for their completion / production!). Additional work will be required by the planning consultant / architect to complete a Climate Change Statement, but many schemes will not be in a position to give precise answers to the questions sought in the Statement.	The SPD encourages developers to make <i>best endeavours</i> towards achieving challenging best practice standards independently identified in the Net Zero Carbon Toolkit. In an SPD these cannot be set as mandatory targets.

From	Representations	NFDC Response
	<p>The NPPF Para 152 talks about 'encourage and support' not regulate and obfuscate or add additional burdens to business.</p> <p>So, before adoption, the LPA must ask itself the following questions and be satisfied with their own answers;</p> <ol style="list-style-type: none"> 1. Para 4 page 6 - As explained, much of the information requested may not be known at the early stages of application. The design and build stage often comes after the cost and delays in getting a planning permission (if forthcoming) in the first place. 2. Any such information submitted may need to change during the processing of the application when the LPA requires design amendments - so floor areas / volumes / detailed design will change - will the CCS need to be updated? 3. As with any planning policy -the requirement's must (amongst others) be clear, precise and enforceable. Who in the LPA will check the specifications on the drawings have actually been implemented? If the answer to this is 'no-one' or 'no capacity' or 'planners do not have the necessary skills to check' then the requirements are somewhat meaningless. 4. As with all design standards and Building Regulation requirements, these constantly change. It is highly likely that even during the processing of the application, the requirements will change. 5. The LPA must make it clear as to the weighting placed upon this issue as a material planning consideration - i.e. are you going to seriously approve a planning application that in your opinion fails to meet one of the other Local Plan polices but as the development is so 'sustainable' this overrides other policy considerations? Officers should be given the opportunity to reach such conclusions otherwise the weight of the SPD will diminish to a point where it loses its credibility. 	<p>The proposed Climate Change Statement brings information largely already sought at planning applications stage (in other documents on the Local Information Requirements list) into one comprehensive document. Regarding outline applications, technical information is stated to be required at detailed design stage, not at the outset if that detail is not yet part of the application.</p> <p>It is expected that developers will check specifications on drawings have been implemented as shown on the drawing, as they will do for all aspects of the development. The LPA will monitor a sample of schemes being implemented and deal with any complaints in the usual way. Noted.</p> <p>Each application will be determined on its own merits.</p> <p>Member and officer training will be undertaken following adoption of the SPD and then form part of regular training for Planning Committee members.</p>

From	Representations	NFDC Response
	<p>6. What Member training will you put in place to ensure the Planning Committee takes the SPD into account?</p> <p>7. Will there be liaison between the LPA and its own Building Control team to assess different options put forward in the CCS? How will this work if the applicant doesn't know at the application stage (many don't) whether they will use LABC or Approved Inspectors?</p> <p>8. Have you thought how innovative design to meet the requirements of the SPD might conflict with Policy STR1 on Local Distinctiveness?</p>	<p>The developer will need to ensure that a scheme complies with Building Regulations. It should not make any difference whether this is achieved through LABC or an Approved Inspectors. Zero carbon and zero carbon ready buildings do not necessarily have to conflict with respecting local distinctiveness and will need to be delivered to meet national carbon reduction (2035) and zero carbon (2050) targets. Should the applicant consider that there is conflict between innovative design and local distinctiveness, the justification for the proposal should be articulated in the design and access statement.</p>
11 S Tonkin	Lacks a timescale for being capable of running without carbon emissions	Comment noted – whilst it is considered appropriate to require a climate change statement, it would not be within the bounds of current government guidance to set a timescale to operate without carbon emissions.
15 L Tonkin	This is effectively guidance and recommended practice. If developers choose not to take it into account, there is no statutory enforcement. In the same way that the Local Plan stipulates 'a requirement for larger developments to have at least 50% affordable and social housing' and yet NFDC repeatedly passes developments with 25%.	Comment noted – whilst it is considered appropriate to require a climate change statement, it would not be within the bounds of current government guidance or the adopted local plan policy to require zero carbon development.
19 New Forest East Constituency Labour Party	The proposals in this document come across as advisory and give a lot of "get-outs" for the developers. Would it be possible to update the Local Plan Policies to ensure there are mandatory elements?	The Local Plan review will continue to address climate change matters and would be the appropriate process to update any local plan policies.
20 Bloor Homes Southern	Bloor Homes supports the preparation of the Planning for Climate Change Supplementary Planning Document. The effects of climate change have the	Comment noted.

From	Representations	NFDC Response
	<p>potential to have long lasting impacts on development, as well as potentially contributing to GHG emissions.</p> <p>We believe that the Council’s aims to reduce operational carbon in buildings, reduce embodied carbon and ensure development is resilient to future climate change broadly aligns with the Governments ambitions to improve building standards over time. However, any specific requirements which go beyond the current Local Plan and national guidance need to be supported by an appropriate evidence base, including a viability assessment (see response on costs under CCS2).</p> <p>We would note that in terms of operational carbon emissions it is the Government’s stated aim in the Future Homes Standard (FHS) consultation in 2019 that the 2025 FHS provides Net Zero Ready homes which are future proofed and do not require retrofitting to operate Net Zero, ‘We have said that from 2025, the Future Homes Standard will deliver homes that are zero-carbon ready’. The 2025 FHS consultation is due this year and will provide clarity on the overall carbon reduction required from new homes, as well as guidance on how this might be achieved.</p> <p>Currently the Building Regulations do not take account of embodied carbon, however it is noted that a number of national guidance documents including the RIBA 2030 challenge, LETI Design guidance and the Net Zero Buildings Standard set out guidance on the measurement and reduction of embodied carbon. Bloor Homes are exploring the impact of embodied carbon as part of the first step in reducing this impact. At this stage we would be cautious about setting specific embodied carbon targets until further information on the feasibility, deliverability and viability of potential targets have been considered. This would be best reserved for National Policy.</p> <p>In terms of adaptation the UK Climate Projections (UKCP18) set out the likely effects of climate change in the UK, these include increasing annual temperatures, increasing winter rainfall and decreasing summer rainfall. In respect of the climate projections the UK Climate Change Risk Assessment</p>	<p>Comments on the broad alignment between SPD and national policy objectives welcomed.</p> <p>The best practice objectives identified in the SPD are sourced from independent industry experts. The SPD ‘best endeavours’ approach provides scope for applicants to explain what they can and cannot achieve, and to justify why other standards may represent best endeavours for a given development. A best endeavours approach provides scope to take into account the wider planning balance including any evidence that achieving higher climate and energy standards would impact unacceptably on development returns.</p> <p>It is noted that Building Regulations do not address embodied carbon. The SPD does not set specific embodied carbon targets but requires that developers address the issue in their climate change statement.</p> <p>The SPD does not require developers to meet the cost of mitigating carbon from electric vehicle charging. However, on-site renewable energy generation will be an essential component of the transition to net zero carbon emissions in line with national policy.</p>

64

From	Representations	NFDC Response
	<p>identifies likely impacts as a results of climate change, these in turn help support changes to policy and guidance to tackle the impacts of climate change. As such key issues affecting the built environment around subjects of flood risk, overheating, biodiversity, water efficiency have been incorporated into key guidance to mitigate these effects. Post 2025 one of the greatest demands for unregulated energy in new homes will be to charge an electric vehicle. Bloor Homes considers it unreasonable to assume that they, as a housebuilder, should effectively meet the cost of mitigating carbon from charging an electric vehicle.</p> <p>If it is the intention that best practice targets are to be included we believe these should be aligned with the RIBA 2030 Climate Challenge targets, these provide a more realistic set of targets in terms of cost and deliverability. In this context we recommend that the Best Practice element of Policy CCS1 is updated to reflect this.</p> <p>Specifications for new build fabric efficiency for residential development should target the operational energy targets set out in RIBA 2030 Climate Challenge, setting progressive targets from 2025 to 2030.</p> <p>As part of the consultation the Government also states it is the aim of the 2025 FHS to provide zero carbon ready homes which are future proofed and do not require retrofitting to operate Net Zero, 'We have said that from 2025, the Future Homes Standard will deliver homes that are zero-carbon ready. We intend to set the performance standard of the Future Homes Standard at a level which means that new homes will not be built with fossil fuel heating, such as a natural gas boiler. These homes will be future-proofed with low carbon heating and high levels of energy efficiency. No further energy efficiency retrofit work will be necessary to enable them to become zero-carbon as the electricity grid continues to decarbonise. Our work on a full technical specification for the Future Homes Standard has been accelerated and we will consult on this in 2023. We also intend to introduce the necessary legislation in 2024, ahead of implementation in 2025'.</p>	<p>Comment noted, however, the Council consider that the Net Zero Carbon Toolkit which uses the LETI standard best practice standards, is appropriate for use in the SPD.</p> <p>Energy efficiency targets will not exceed Building Regulations requirements, as set out in the Written Ministerial Statement – Planning – Local Energy Efficiency Standards Update – 13/12/23.</p> <p>The SPD does not require the best practice objective (zero carbon in operation) and allows for development to meet the secondary objective (zero carbon ready).</p>

65

From	Representations	NFDC Response
	<p>While we believe the best practice objective (zero carbon in operation goes beyond national guidance and goes too far, we believe the provision of the secondary objective (zero carbon ready) is in alignment with national policy and guidance.</p>	
<p>21 R Kent</p>	<p>There would appear to be significant risk that this proposal ends up duplicating the requirements of the Building Regulations. It would be more efficient, logical and holistic if the requirements for addressing climate change and building fabric, requirement for on-site renewables / embedded carbon need to be set CENTRALLY and NATIONALLY and not subject to duplication / (mis)interpretation by local planning authorities.</p> <p>As we all know the UK planning system is in enough of a mess with inconsistency and incoherence between different planning authorities - the last thing we need is yet more piecemeal bureaucracy whereby LPAs are going to ask applicants to spell out what they will be required to do under the Regs anyway. In my opinion planning should become more centralised (by County, or even national) - most planning application simply need to adhere to National policy with only a small proportion that are subject to local idiosyncrasies, which could be covered by the necessary additional forms. It will be the case with the majority of planning applications in needing to adhere to the elements set out in this proposal. The key elements are covered by Parts G and L of the Building Regs.</p> <p>At a time when funding for local authorities is strained, let's waste time, effort & money recreating the wheel. If a planning application is going to be built out it will need to comply with the Building Regs particular to that application. NFDC would bet better off investing resources in policing the implementation of Building Regs rather than creating more hurdles at planning. Applicants can promise the most highly performing insulation at planning, but then go on to install the cheapest mineral fibre. I pass building sites all the time with newbuilds with a bit of mineral wool loosely dropped into a 100mm cavity. No one is policing this, no one is checking and when it's all sealed up no one will know. Far better to require Building Control Officers / Approved</p>	<p>The Building Regulations and the Future Homes/Buildings changes planned to them (if they are implemented) have been widely criticised as falling well short of what can already be readily achieved by best practice approaches.</p> <p>The business-as-usual approach to development based on BR compliance also fails to address what can be achieved by good design to utilise natural/passive heating and colling/ventilation to best effect, as the compliance assessment process takes the development design (regardless of any shortcomings) as a given.</p> <p>Where there is thematic overlap with BR, the SPD targets the initial design stage to improve the prospects for achieving BR compliance without recourse to sub-optimal bolt-on fixes such as air conditioning.</p> <p>The SPD will help to explain how to comply with policies STR1 & ENV3 of the adopted Local Plan.</p> <p>Comment noted. The Council considers that to fully address climate change considerations it needs to implement building regulations and approach the issue at the planning/site design stage.</p>

From	Representations	NFDC Response
	Inspectors to be far more vigilant in checking with severe penalties for non-compliance with the Regs (Part L in particular).	
22 M Humber	Net zero requires brave decisions. Moving green belt areas to National Park boundaries. Building terraced Passive housing with triple glazing, using grey water, all roofs to have solar panels and high levels of insulation. Windows facing the sun. Occupants will have low costs for utilities. If not homes in the future will have to be retro fitted which will be costly.	Comment noted. The SPD supports implementation of adopted local plan policies within the bounds of the policy and government guidance.
26 Alex Lawton	About right	Comment noted.
27 Bargate Homes	<p>Table 1 (page 15) of the SPD details the items expected to be covered by Climate Change Statements which are set to become a validation requirement. Indeed, paragraph 44 of the SPD states that some of the requirements for these statements are challenging, given the scale and urgency of the climate challenge. Bargate Homes agree with this sentiment and are committed to taking meaningful steps to bring forward development which rises to this challenge.</p> <p>It is welcome that something of a 'sequential approach' to building design in meeting Future Homes standard is set out by the SPD, where developers are encouraged to go as far as may be possible in meeting this standard, whilst still acknowledging that this may not be achievable in all instances for any variety of reasons.</p>	Support and recognition that the SPD has some flexibility in approach is welcomed.
28 BDW Homes	<p>Raise concerns with the KPI targets for energy use and space heating, respectively 35 and 15 kWh/m²/year, and recommend that the heating KPI be removed and the EUI KPI be replaced with a range of values to allow for flexibility in design and typology.</p> <p>The space heating KPI is equivalent to PassivHaus standard (as the draft SPD notes). Typologies such as bungalows and 'room in roof' dwellings would struggle to achieve this due to their form factor. This standard would</p>	The KPIs are stated to be best practice values that developments should target achieving. They are an integral part of the independent Net Zero Carbon toolkit which is an indivisible part of the SPD document. They are not fixed targets that have to be met, and it is acknowledged that they may not always be achievable (see for example SPD paras 44-55 'Best practice and best endeavours').

From	Representations	NFDC Response
	<p>require changes to the design of homes and layout of sites, there are supply chain and skills challenges to its implementation, and viability implications.</p> <p>Passivhaus is not required to achieve net-zero carbon. A recent report by the UK Green Building Council set out that achieving the equivalent of PassivHaus standards would amount to £263/m2 of additional build cost, potentially creating a significant barrier to the entry of SME developers.</p>	<p>The intention of the SPD is that it will support the need to change the design of homes and layout of sites to achieve compliance with adopted local plan policies STR1 & ENV3.</p> <p>It is agreed that zero carbon in operation can be achieved in other ways, but higher values for total energy use and space heating would mean that the building would require more energy (and cost) to run than a best practice example.</p>
<p>30 Stoford Developments Ltd</p>	<p>We fully endorse the objectives of the draft Planning for Climate Change SPD and consider it provides the right level of detail for addressing climate change in planning applications, to meet Local Plan requirements.</p> <p>We support the requirement to provide a Climate Change Statement to accompany a planning application containing information pertinent to climate change mitigation and zero carbon, and climate change adaption.</p>	<p>Support welcomed</p>
<p>31 Persimmon Homes</p>	<p>The aims and objectives of the draft SPD are laudable and supported in principle in terms of encouraging zero carbon ready construction, however, they are unduly onerous and place yet more burdens upon applicants - at a time when financial constraints have consistently increased across the sector. The requirements, both in terms of resource and the financial implications of these extra reports (Reports need to be outsourced and prepared by specialist consultants who obviously require a fee for their completion / production and have a lead in time for instruction and completion). Additional work will be required by the planning consultant / architect to complete a Climate Change Statement, but many schemes will be at an early feasibility stage and therefore will not be in a position to give precise answers to the questions sought in the Statement. Such requirements are better achieved by requiring development to meet the current Building Regulation standard in force at the time of construction /completion.</p>	<p>The SPD encourages developers to make <i>best endeavours</i> towards achieving challenging best practice standards independently identified in the Net Zero Carbon Toolkit. In an SPD these cannot be set as mandatory targets.</p>

From	Representations	NFDC Response
	<p>We would direct you back to government advice contained in the National Planning Practice Framework (NPPF) Para 152 which talks about 'encourage and support' not regulate and obfuscate or add additional burdens to business.</p> <p>We would also recommend, that before adoption of the SPD, the LPA must ask itself the following questions as to their own internal capacity and expertise and be entirely satisfied with their ability to interpret and understand the breadth and depth of the reports the SPD is requiring in order for this additional cost to be meaningful;</p> <p>(a) Para 4 page 6 - As explained, much of the information requested may not be known at the early stages of application. The design and build stage often comes after the cost and delays in getting a planning permission (if forthcoming) in the first place.</p> <p>(b) Any such information submitted may need to change during the processing of the application when the LPA requires design amendments - so floor areas / volumes / detailed design will change - will the CCS need to be updated?</p> <p>(c) As with any planning policy - the requirement's must (amongst others) be clear, precise and enforceable. Who in the LPA will check the specifications on the drawings have actually been implemented? If the answer to this is 'no-one' or 'no capacity' or 'planners do not have the necessary skills to check' then the requirements are somewhat meaningless.</p> <p>(d) As with all design standards and Building Regulation requirements, these constantly change. It is highly likely that even during the processing of the application, the requirements will change – how will the LPA deal with this?</p> <p>(e) The LPA must make it clear as to the weighting placed upon this issue as a material planning consideration - i.e. are you going to seriously approve a planning application that in your opinion fails to meet one of the other Local Plan polices but as the development is so 'sustainable' this overrides other policy considerations? Officers should be given the opportunity to reach such conclusions otherwise the weight of the SPD will diminish to a point where it loses its credibility.</p>	<p>The proposed Climate Change Statement brings information largely already sought at planning applications stage (in other documents on the Local Information Requirements list) into one comprehensive document. Regarding outline applications, technical information is stated to be required at detailed design stage, not at the outset if that detail is not yet part of the application.</p> <p>It is expected that developers will check specifications on drawings have been implemented as shown on the drawing, as they will do for all aspects of the development. The LPA will monitor a sample of schemes being implemented and deal with any complaints in the usual way. Noted.</p> <p>Each application will be determined on its own merits.</p> <p>Member and officer training will be undertaken following adoption of the SPD and then form part of regular training for Planning Committee members. The developer will need to ensure that a scheme complies with Building Regulations.</p>

69

From	Representations	NFDC Response
	<p>(f) What Member training will you put in place to ensure the Planning Committee takes the SPD into account and understands the figures and contents of officer reports?</p> <p>(g) Will there be liaison between the LPA and its own Building Control team to assess different options put forward in the CCS? How will this work if the applicant doesn't know at the application stage (many don't) whether they will use LABC or Approved Inspectors?</p> <p>(h) Have you thought how 'innovative design' to meet the requirements of the SPD might conflict with Policy STR1 on Local Distinctiveness? Which will take precedent? For example, a home designed to the latest eco home specifications but is not a replica of the surrounding development?</p>	<p>It should not make any difference whether this is achieved through LABC or an Approved Inspectors.</p> <p>Zero carbon and zero carbon ready buildings do not necessarily have to conflict with respecting local distinctiveness and will need to be delivered to meet national carbon reduction (2035) and zero carbon (2050) targets. Should the applicant consider that there is conflict between innovative design and local distinctiveness, the justification for the proposal should be articulated in the design and access statement.</p>
<p>32 McCarthy Stone</p>	<p>Thank you for the opportunity to comment on the New Forest District Climate Change Supplementary Planning Document (SPD) consultation ('draft SPD'), June 2023. McCarthy Stone is the leading provider of specialist housing for older people in the UK. Please find below our comments on the consultation.</p> <p>Whilst it is acknowledged that para 2 of the draft SPD states that it sets 'out best practice approaches or standards that developers are encouraged to target or to adopt, to take all practicable steps to decarbonise the running of buildings; to meaningfully reduce embodied carbon in construction; and to ensure development is climate change adapted' and that 'The aim is to ensure that designs are climate change optimised before planning applications are submitted'. It appears that the aim of the draft SPD is to require developers to deliver 'net zero' development as it requires information to be provided with a planning application to meet such standards and for developers to identify why such targets are not being delivered.</p> <p>The Council should note that the PPG on 'Plan Making' identifies the role of supplementary planning documents. This identifies at paragraph: 008 Reference ID: 61-008-20190315 that 'Supplementary planning documents (SPDs) should build upon and provide more detailed advice or guidance on policies in an adopted local plan. As they do not form part of the development</p>	<p>The Local Plan policies that the SPD provides supplementary guidance on are noted in the SPD document at appendix A. As the Local Plan does not have a policy that explicitly sets a zero-carbon requirement, it is correct that the SPD cannot require it, and it does not. The SPD <i>encourages best endeavours</i> towards that objective with a secondary objective of being 'zero carbon ready' that reflects Policy STR1 which requires that development be future proofed for climate change, and also reflects emerging national policy (such as the Future Homes standard, consistent with NPPF para 152 guidance that 'the planning system support the transition to a low carbon future in a changing climate' and 'should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions').</p>

From	Representations	NFDC Response
	<p>plan, they cannot introduce new planning policies into the development plan. They are however a material consideration in decision-making. They should not add unnecessarily to the financial burdens on development’.</p> <p>Given the Local Plan policies, any requirement or SPD should remain in line with Government targets and the proposed changes to the building regulations. There is considerable momentum from Government in preparing enhanced sustainability standards and it is clear the energy efficiency requirements for domestic and non-domestic buildings will increase sharply in the coming years and aligning the Council’s requirement for carbon neutral development with those of Government would be consistent with national policy.</p> <p>Recommendation: <input type="checkbox"/> The SPD is either not taken forward as Net Zero Carbon development is being dealt with via the Building Regulations or the draft SPD should be substantially amended so that the guidance aligns with the timetable for the changes to the building regulations.</p> <p>Thank you for the opportunity for comment.</p>	<p>The intention of the SPD is that it will support the implementation of adopted local plan policies STR1 & ENV3.</p> <p>Comment noted. There is no need for the SPD to repeat the requirements of Building Regulations. It will, however, support the implementation of adopted local plan policies STR1 & ENV3 in relation to the design of buildings and layout of the site.</p>
<p>35 Ringwood Town Council</p>	<p>Overall, this is an excellent SPD. Like the similar work in the Ringwood Neighbourhood Plan, it is based on the LETI guidance, the Net Zero Carbon Toolkit, the use of Building for a Healthy Life and using standards such as BREEAM. It is strongly supported. The following comments are made with a view to improving certain aspects and are not intended to be critical of the overall aims of the SPD.</p> <p>It is also worth noting that a significant proportion of carbon used in a development is not in the buildings themselves. Concrete and tarmac have very high footprints. It would be good to see an SPD addressing ‘abnormals’, which would be within the scope of ENV3. High ‘abnormals’ costs in financial viability assessments likely link with similarly high carbon costs. It is hoped that future Strategic Site allocations will take this into account.</p> <p>It could go further. The concept of ‘net zero ready’ to ‘future proof’ is flawed for new builds. Why wait until tomorrow when the implementation can be</p>	<p>Support welcomed.</p> <p>Comment on materials used for construction of roads/pavements within a site are noted. The SPD has taken an approach to embodied carbon that is considered appropriate in terms of adopted local plan policies and government guidance.</p> <p>The SPD can only supplement adopted local plan policies. Changes to the Building Regulations are likely to prevent the installation of gas boilers from 2025.</p>

From	Representations	NFDC Response
	<p>done today? However, we accept that this is the wording in the current Local Plan. No new building should have gas-supplied boilers. If this SPD allows that, it is flawed.</p> <p>On the table on p15, we would like to see more ‘Y’s. Heat pumps in minor developments – why not? Smart energy systems in non-domestic building – why not? We are also unconvinced by categories on this table. “2c Option to purchase PV pre-installation” – why? To get to zero operational energy, renewables are required. For most builds, these will be PV, although roof-based wind turbine options are becoming available. “Design to Building for a Healthy Life” – why ‘Y’ for only developments of 50+ dwellings? Add in “Rainwater capture/reuse”? More ‘Y’s and better categories please.</p>	<p>The SPD is a step toward zero carbon consistent with current local plan policies. Further steps such as setting fixed minimum standards would need to be introduced as part of a future local plan review. The Council considers that it has struck an appropriate balance between asking developers to address climate considerations in new development without unduly burdening smaller developments. Building for a Healthy Life is more relevant for larger developments.</p>
38 National Highways	We have reviewed this consultation and have no comments.	Comment noted.
39 Fiddlesticks Farm	<p>Local authorities should consider climate change mitigation and adaptation throughout the Local Plan and application process, and hence we support NFDC’s broad strategy and approach, based around the following themes (Table 1):</p> <ol style="list-style-type: none"> 1. Minimising energy demand targeting net zero carbon in operation; 2. On-site renewable energy generation; 3. Reducing embodied carbon emissions; 4. Sustainable travel; 5. Avoiding overheating; 6. Flood risk reduction and sustainable urban drainage; 7. Drought resilience and using water efficiently. <p>We support NFDC in seeking to make progress against the above aims, and we recognise that as a major housing site, development at Fiddlesticks Farm should positively address each. As a landowner, our client attaches great value to sustainability and creating a positive legacy, and these will be prioritised when a development partner is selected. Many climate change</p>	Support noted and welcomed.

71

From	Representations	NFDC Response
	<p>mitigation and adaptation measures relate to the detailed design stage and so we do not provide detailed commentary now.</p> <p>We do not offer detailed commentary on validation requirements and the wording of individual policies at this stage, other than to encourage NFDC to maintain appropriate flexibility in its approach. In saying this we are mindful that (i) this SPD affects all forms of development in the District; (ii) individual developments are affected differently by financial, viability and other issues; and (iii) climate change mitigation/adaptation is a rapidly evolving field, such that the specific measures to deliver sustainability will evolve and improve over time.</p> <p>We look forward to receiving updates as this SPD progresses and to working closely with NFDC on Local Plan matters.</p>	
40 The Coal Authority	As New Forest District Council lies outside the defined coalfield, the Planning team at the Coal Authority has no specific comments to make.	Comment noted.
42 P Stickley	Thank you for providing a link to your email inbox. I am impressed that you undertake to seek public opinion about the way such policies are at least drafted; I hope that this attitude is deeply entrenched in other LAs.	Comment noted.
43 Natural England	<p>Climate change is already having a profound impact on nature and society in England and across the world. The projected scale and rate of climate change, coupled with existing environmental pressures, has serious implications for the natural environment and the services it provides to society. In response, many local authorities across England are formally declaring a climate change emergency and are now looking for practical steps to address it. The faster that greenhouse gas emissions can be reduced, the more the overall pressure on the natural environment will be reduced. The land use planning and development process is a key sector in driving down emissions and fighting the impacts of climate change.</p> <p>Your developing SPD provides a prime opportunity to deliver local but necessary measures in tackling this existential problem.</p> <p>Natural England welcomes your Council’s development of a Climate Change SPD that promotes mitigation and adaptation to climate change through various methods. We welcome that developers will be required to submit a</p>	<p>Comments noted.</p> <p>Advice on nature-based mechanisms to address climate change is welcomed. SPD to be amended to include references to nature-based solutions and signpost the Natural England report Carbon Storage and Sequestration by Habitat 2021 and the</p>

From	Representations	NFDC Response
	<p>Climate Change Statement (CCS) to demonstrate how they will implement mitigation and adaptation measures such as the integration of low carbon technologies and renewable energy generation, energy efficient design, reduced carbon emissions from construction phase, sustainable travel and the integration of green and blue infrastructure into development design such as Sustainable Urban Drainage Systems (SuDS) and planting. We welcome the incorporation of the Net Zero Carbon Toolkit (NZCT), updated for the NFDC circumstances. However, overall, we feel the SPD can be much stronger in recognising and requiring the role of the natural environment in tackling climate change. Please see more detailed advice and recommendations below, particularly on nature-based solutions.</p> <p>The SPD provides a prime opportunity for the Council to set an ambitious climate-specific target(s) for reducing greenhouse gas emissions that can be monitored over the Plan period, in line with the national commitment to achieving the national statutory target of net zero emissions by 2050. Meaningful targets should be monitorable over the local plan period to demonstrate the effectiveness of local policy in addressing climate change, and to ensure appropriate remedial action can be taken as necessary.</p>	<p>Council’s informal BNG guidance and the forthcoming Biodiversity SPD.</p> <p>The setting of more detailed targets is considered more appropriate as part of a local plan review, which would also provide the opportunity to set minimum standards rather than to encourage better practice.</p>
<p>44 Cranbourne Chase AONB</p>	<p>The adopted AONB Management Plan has climate change running through it so it should, I suggest, be a reference document for those parts of NFD that are in this AONB.</p> <p>I read that many of the proposals relate to development and may, therefore, come within the overview of Building Control.</p>	<p>Cross reference to the AONB Management Plan added to the SPD.</p>

Benefits and costs of Net Zero carbon development

Q2. Would you be prepared to pay more to rent or purchase a home or premises that had higher energy efficiency standards and that was more climate change resilient, but was otherwise of a comparable standard to current new builds?

From	Comment	NFDC Response
05 A Ford	A stronger plan is needed for existing homes	Agreed, but beyond the scope of this SPD which relates to new development.
09 R Palmer	Higher energy efficiency standards and developments being prepared for a zero carbon future (e.g. renewable energy, heat pumps, EV charging) will help to reduce costs for people living there, even with higher rents/house prices. It's important for NFDC to communicate this to prospective house buyers on the benefits of switching to zero carbon technology. However, this should not be an excuse to charge significantly more for properties than needed so as to discourage people.	Comment noted.
10 Chapman Lilley Planning	This will inevitably put up the price of a home and make the possibilities of first time buyers even less affordable than it is already. It will also put up rents. What is the point in having a low carbon building if you can even afford a mortgage to get into it? Are you inadvertently discriminating against lower income families and preventing them from getting a home? Your equalities statement should be updated to reflect this consideration. Have you assessed the full additional costs of providing a fully zero carbon building on the purchase price?	Wider industry evidence cited in the SPD indicated that cost differentials typically range from 2-6% and are likely to reduce over time. Construction costs are a part of the cost of a home, land value is a major factor, so any construction cost increase does automatically translate into an equivalent dwelling cost increase. Household running costs form part of the evaluation of what mortgage applicants can afford to borrow and spend. The lowest cost market housing choices are almost always in the existing housing stock. The Council does not agree that the implementation of adopted local plan policies STR1 & ENV3 will increase purchase prices as developers will generally set prices at the maximum the market will bear.

74

		There is no policy requirement to implement the best practice measures contained in the SPD.
11 S Tonkin	The long-term costs will be much greater if we don't get a handle on this very soon!	Comment noted.
12 B Lord	Page 15 - Table 1 - Line 4b Design to Building a Healthy Life. The building of 10-49 homes should be seen as major development, therefore No should be changed to Yes in the column.	The principles contained in the Design to Building a Healthy Life document and that are given a green, amber or red assessment could be difficult to achieve on developments of between 10 and 49 dwellings as they contain criteria that relate to developments that would be typically larger than 50 dwellings.
13 A Witt	Given the small additional cost of meeting the standards and the likely length of mortgage applicable to the dwelling the cost is minimal and should not be a barrier to making a development sustainable.	Comment noted.
15 L Tonkin	Climate change is not a choice, it is something we all have to mitigate, now.	Comment noted.
19 New Forest East Constituency Labour Party	We feel the increased cost of rent or purchase should be offset by lower running costs and a higher resale value for the occupant/owner. Plus the added benefit of slowing down climate change.	Comment noted.
20 Bloor Homes Southern	Any specific requirements which go beyond the current Local Plan and national guidance need to be supported by an appropriate evidence base, including a viability assessment. In adopting the SPD the Council should give consideration to the applicability of any new guidance to current applications. In particular the best practice objectives set out in the SPD potentially add significant additional cost into development which will not have been considered as part of the development viability. Such additional cost may also undermine the viability testing that underpins the Council's CIL Charging Schedule. Any additional requirements should be restricted to new applications coming forward after the adoption of the SPD and cannot be reasonably retrospectively applied.	Wider industry evidence cited in the SPD including from the Climate Change Committee indicated that cost differentials typically range from 2-6% and are likely to reduce over time, especially as low or zero carbon operation becomes a starting point for stock housing designs rather than being treated as a retrospective fix to existing designs that should be evolved. Construction costs are a part of the cost of a home, land value is a major factor, so any construction cost increase does not automatically translate into an equivalent dwelling cost increase as developers will

		<p>generally set prices at the maximum the market will bear. However, lower running costs would be reflected in a price premium compared to those without climate change measures.</p> <p>There is no policy requirement to implement the best practice measures contained in the SPD.</p> <p>The SPD will be applied to all outstanding planning applications at the time it is adopted as is the case with all new planning policy documents.</p>
22 M Humber	Passive housing would be cheaper to run and would be better than the standards we have at present. This is a loaded question.	Comment noted.
26 Alex Lawton	May pay more if the standards achieved were commensurately higher. The costs of achieving higher than regulatory standards at the time of construction are lower than retrofitting properties to higher standards which will become necessary to cope with the climate crisis. The benefits in terms of ongoing reduction in operating costs and increased comfort of properties will only increase as the climate worsens.	Comment noted.
30 Stoford Developments Ltd	Our buildings are designed to minimise the embodied carbon in construction, and to reduce the amount of energy required to run the facilities.	Comment noted.
31 Persimmon Homes	<p>The 'upfront' additional costs of implementing these proposals will need to be added to the dwelling market price, which will in turn price many first-time buyers and renters out of the market – surely that is not your intention?</p> <p>As explained above, these requirements will inevitably put up the price of a home and make the possibilities of first-time buyers even less affordable than it is already. It will also put-up rents. What is the point in having a low carbon building if you can't even afford a mortgage to get into it? Are you inadvertently discriminating against lower income families and preventing them from getting a home? Your equalities statement should be updated to</p>	<p>Wider industry evidence cited in the SPD indicated that cost differentials typically range from 2-6% and are likely to reduce over time. Construction costs are a part of the cost of a home, land value is a major factor, so any construction cost increase does automatically translate into an equivalent dwelling cost increase.</p> <p>Household running costs form part of the evaluation of what mortgage applicants can afford to borrow and spend. The lowest cost</p>

	reflect this consideration. Have you assessed the full additional costs of providing a fully zero carbon building on the purchase price?	market housing choices are almost always in the existing housing stock. The Council does not agree that the implementation of adopted local plan policies STR1 & ENV3 will increase purchase prices as developers will generally set prices at the maximum the market will bear. There is no policy requirement to implement the best practice measures contained in the SPD.
32 McCarthy Stone	Whilst the Council's commitment to meeting net zero carbon emissions and climate change targets are commendable the council do not appear to have a sound planning policy basis to require net zero with the relevant policies, as detailed in paragraph 1 of the draft SPD being, STR1 that states 'All new development will be expected to make a positive social, economic and environmental contribution to community and business life in the Plan Area by: ... vi. Ensuring that new development is adaptable to the future needs of occupiers and future-proofed for climate change and innovations in transport and communications technology' and policy ENV3 'New development will be required to: ... v. Incorporate design measures that improve resource efficiency and climate change resilience and reduce environmental impacts wherever they are appropriate and capable of being effective...' Consequently, the SPD should not be taken forward as this would be contrary to Paragraph: 008 Reference ID: 61-008-20190315 of PPG. Requiring developers to build to net zero and other carbon reduction requirements goes beyond the adopted Local Plan policy and has a cost implication that would add an unnecessary financial burden to development again contrary to Paragraph: 008 Reference ID: 61-008-20190315 of the PPG.	There is no policy requirement to implement the best practice measures contained in the SPD. The SPD does not require development to be net zero carbon. The intention of the SPD is that it will support the implementation of adopted local plan policies STR1 & ENV3.
33 New Milton TC	Buyers should not be forced to pay more at a time when all costs are rising and salaries are not keeping up.	The SPD would have no effect on the existing housing stock, which makes up the vast majority of homes for rent or sale.
35 Ringwood Town Council	May pay more if the standards achieved were commensurately higher. We believe people in Ringwood will be prepared to pay more. As a relatively affluent area, a modest increase in capital outlay for the return of lower	Comment noted.

	<p>operating costs would be attractive to most. A minor omission relates to so-called Green Mortgages, where the ability to more easily afford mortgage repayments is recognised by building societies. They have presumably carried out the cost-benefit analysis, so we won't comment further. We note that a 10%, say, increase in build cost corresponds to something like a 3% of the sales price of the property, as implied in paragraph 32.</p>	
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Minimising energy demand targeting net zero carbon in operation (CCS1)
 Q3. What are your views on the proposed best practice objective that new buildings should be zero carbon in operation wherever possible, and at the very least future proofed to be zero carbon ready?

79

From	Comment	NFDC Response
05 A Ford	Existing buildings need to be carbon neutral as well as new ones.	Comment noted – although beyond the scope of this SPD which relates to new development.
08 P Thomas	<p>The UK and other affluent countries need to lead the way in reducing CO2 production to allow for countries which will not have the funding necessary to reduce their CO2 production.</p> <p>The country also needs to set higher CO2 reduction standards to mitigate existing buildings which will be more difficult to insulate e.g. traditionally constructed and heritage buildings.</p>	Comment noted. Existing buildings are beyond the scope of this SPD which relates to new development.
10 Chapman Lilley Planning	<p>1. The preamble to CCS1 (Para 45) explains 'developers need to ensure their designs are capable of meeting the Future Homes and Future Buildings Standards.' As explained previously, at the initial planning application stage, this level of detail is not always known - plus the LPA will inevitably ask for amendment (rarely does it suggest the building be made larger!) so all these calculations will quite possibly change during the application process. Once approved, the application will go through the Building Regulations process and internal details and specifications no doubt change again.</p> <p>2. Para 48 - is it really necessary to continually update the CCS? This is yet more bureaucracy and paperwork which relates to more burdens upon the applicant?</p> <p>3. As ever, who from the Council is going to actually check the internal incredibly detailed specifications are in accord with the CCS? What are you going to do if they are not?</p> <p>4. If you haven't done so already, please speak with your Economic Development Officer regarding the requirement at Para 49 to obtain a BRE New Construction 'excellent' standard. I know for a fact that a LPA in Dorset removed this onerous requirement from its own Local Plan, as the feedback</p>	<p>As the Future Homes and Future Buildings Standards reflect Building Regulations, there is no change to the situation that developers will need to ensure their designs are capable of meeting building regulations.</p> <p>Some degree of updating may be necessary depending on the changes to an application.</p> <p>It is expected that developers will check specifications on drawings have been implemented as shown on the drawing, as they will do for all aspects of the development. The LPA will monitor a sample of schemes being implemented and deal with any complaints in the usual way. This an existing requirement in the adopted local plan and can only be changed when the local plan is reviewed.</p>

	<p>from the commercial property sector was that in effect, it would stifle new build industrial / commercial property and therefore cause the District to lose jobs. Have you factored this commercial building viability/ job creation / retention into your equalities statement and the effect this will have on job creation and retention?</p> <p>5. Will the submission of a CCS be a validation requirement? If so, who will be qualified to check they are adequate?</p> <p>6. Who is going to check that the detailed internal design of the building allows it to be 'future proofed'?</p> <p>7. The requirement (Page 20) for 'Inclusion of 'smart' energy use and heating control and monitoring systems' is surely just going to be an annotation on a plan with no real meaning for the planner.</p> <p>8. CCS 1b states at one point '.....If this commitment is made the heating system details can be dealt with by a planning condition' I would respectfully suggest this would be classed a ultra vires and exceeds what is necessary to grant planning permission. It does not meet the 6 tests at Para 55 of the NPPF. Again - who is going to check?</p> <p>9. CCS 1c providing 'calculations of the space heating demand.' again exceeds what is necessary to grant planning permission and unduly onerous on the applicant. How will this calculation be checked in any event?</p> <p>10. An additional requirement is revealed in CCS 1e 'future proofing statement' is yet another piece of paperwork required for no obvious reason.</p> <p>11. CCS 1f Option to purchase heat pump.....'buyers purchasing off-plan should be given the opportunity to purchase from the developer heat pump system pre-installation at a discounted supplementary cost.' All reference to this should be deleted - it is not relevant to planning and cannot be enforced.</p>	<p>Yes, ultimately there will be a planning judgement as to whether it is adequate, in a similar way to say a Transport Assessment, for example. The developer would be expected to address this in the Climate Change Statement.</p> <p>There is no requirement to provide this although it is recommended.</p> <p>If the developer does not wish to include a low carbon energy efficient heating system it cannot be compelled to do so, subject to compliance with Building Regulations, although it would need to state this in its climate change statement. The reference to the condition will be deleted. The information is to assist with assessing whether the development complies with Policies STR1 and ENV3 of the adopted local plan. Developers should be considering such matters at design stage prior to applying for planning permission.</p> <p>This is being encouraged as best practice and is not a requirement.</p> <p>If the developer does not wish to include renewable energy generation it cannot be</p>
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	<p>12. CCS 2a and CCS2b - as explained above, it is not always known at the planning application stage. Does the LPA routinely check (a) that any renewable energy required by a planning condition is actually installed (b) is working in accord with the approved specifications and (c) continues to work for the lifetime of the development?</p> <p>13. CCS2c - see comment 11 above - not relevant to planning and not enforceable so should be removed.</p> <p>14. CCSC3a and b - as explained above - the construction process may not yet be known.</p> <p>15. CCS5a - as explained earlier, 'choice of building materials surfaces and hard landscaping' if fully sustainable in accord with the SPD may conflict with the desires to keep developments 'locally distinctive' - there needs to be more guidance upon how this conflict might be overcome.</p> <p>16. CCS5a - the Good Homes Alliance early stage overheating tool requirement is the THIRD additional document being requested by the LPA</p>	<p>compelled to do so, although it would need to state this in its climate change statement.</p> <p>This is being encouraged as best practice and is not a requirement.</p> <p>This is being encouraged as best practice and is not a requirement.</p> <p>In this circumstance occurs the developer can articulate its reasoning in its climate change statement/design and access statement.</p> <p>Comment noted.</p>
<p>11 S Tonkin</p>	<p>No timescales for when future-proofing options are to be implemented. Too many exemptions for eg heat-pump or solar PV pre-installation options, SUDs, reducing embodied carbon.</p>	<p>The SPD cannot set policy which could only be achieved through a review of the local plan or national policy. It does seek to encourage best practice.</p>
<p>12 B Lord</p>	<p>There's no indication given as to who will complete the CCS. It must be completed by a competent, qualified consultant (like the Ecology Statements, for example) and should not be left to the developer/householder to complete.</p>	<p>The Council considers that the developer/applicant will need to complete the climate change statement.</p>
<p>15 L Tonkin</p>	<p>Recommended not compulsory, if developers choose to ignore it, then they will. All the technologies are there to make zero carbon houses now, they do not have to be zero carbon ready - that is a get out clause.</p>	<p>The SPD cannot set policy which could only be achieved through a review of the local plan or national policy. It does seek to encourage best practice.</p>
<p>19 New Forest East Constituency Labour Party</p>	<p>The best practice is good, but this should be more appear more explicitly in the Local Plan Policies to ensure Councillors and Planning officials have a clear mandate for approving/rejecting planning applications.</p>	<p>The SPD cannot set policy which could only be achieved through a review of the local plan or national policy. It does seek to encourage best practice.</p>

<p>20 Bloor Homes Southern</p>	<p>The current Building Regulations focus on achieving a set carbon reduction over previous iterations, i.e. Part L 2021 looks to achieve a 31% carbon reduction over Part L 2013, with the 2025 FHS looking to achieve a 75-80% carbon reduction over Part L 2013. While it is noted minimising energy demand is a route to reducing emissions no specific space heating or energy intensity targets are set. A recent decision by an Inspector in respect of the Examination of the Salt Cross Village Area Action Plan (AAP) concludes, that in setting similar energy and carbon targets for development to those in Policy CCS1, there are inconsistencies between the approach set out in Policy 2 and the national policy position and that the requirements set out are not reasonable and was judged a reason for amending this requirement in favour of aligning with national policy.</p> <p>The Governments Future Homes Standard Consultation in 2019, notes, ‘as we move to ever higher levels of energy efficiency standards for new homes with the 2021 Part L uplift and Future Homes Standard, it is less likely that local authorities will need to set local energy efficiency standards in order to achieve our shared net zero goal.’</p> <p>Paragraph 32 includes an estimate of potential cost uplifts for delivering net zero operational homes of 2%-6% above the current Part L 2021. This is based on information prepared for Winchester City Council and notes that the costs shown are correct as of Q2 in 2022, since then inflation has had a significant impact on UK building costs and these are likely out of date. Costs and viability can also vary significantly based on location and in the context of site specific constraints. To be considered sound new policy requirements should be supported by a viability assessment, before any requirements that go beyond current policy and national guidance can be adopted the Council needs to provide evidence to confirm these are viable.</p> <p>Importantly it is also noted that these costs represent ‘those anticipated for a moderately experienced project team’. The Government’s 2019 FHS consultation and response set out the rationale for implementing a staged approach to reducing emissions, largely in response to capacity and skills in the market to deliver the required changes. In particular this notes the</p>	<p>There is no policy requirement to implement the best practice measures contained in the SPD. The SPD does not require development to be net zero carbon. The intention of the SPD is that it will support the implementation of adopted local plan policies STR1 & ENV3 and it is helpful if developers consider these matters at design/planning application stage.</p> <p>Comment noted – changes to the Building Regulations are currently the subject of consultation.</p> <p>The SPD cannot set policy which could only be achieved through a review of the local plan or national policy. It does seek to encourage best practice and assist with assessing whether the development complies with Policies STR1 and ENV3 of the adopted local plan. Net zero operational homes will likely attract an increased sale price due to lower running costs.</p> <p>There is no policy requirement to implement the best practice measures contained in the SPD.</p>
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	<p>requirements to scale up and upskill the delivery of heat pumps. In setting a requirements which go beyond the Building Regulations there are likely to be significant increased costs initially associated with upskilling, changing supply chains etc which are not considered in the Winchester viability assessment before the sector becomes experienced in delivery.</p> <p>Furthermore the total energy target of 35kWh/m2/yr includes both regulated and unregulated energy. While Bloor Homes supports the delivery of low carbon homes it is considered any targets should be restricted to regulated energy only. As a housebuilder Bloor Homes only has the ability to influence the regulated energy demand of homes through design and specification of materials and systems and renewable energy technologies. The unregulated energy consumption, (often referred to as 'plug in load') of homes is ultimately the function of the residents use of the building, which cannot be influenced by the developer and therefore the requirement on the developer to offset emissions from residents unregulated energy use is not appropriate.</p> <p>(See additional information for remainder of the response for CCS1)</p>	<p>Comment noted. Developers are not being asked to control the future unregulated energy consumption but to ensure that sufficient generation capacity will be provided to meet likely demand.</p>
21 R Kent	<p>A national matter (building regulations), not a local one.</p>	<p>The intention of the SPD is that it will support the implementation of adopted local plan policies STR1 & ENV3.</p>
22 M Humber	<p>Planning should be made easier and quicker to enable zero carbon houses. Passive Houses. Builders and developers should be educated in passive housing aims and given directives to abide to. All properties to have Solar panel. Use grey water, triple glazing, heat source pumps, terraced houses, bicycle sheds, cycle paths and safe walking routes for schools and shopping.</p>	<p>The SPD cannot set policy which could only be achieved through a review of the local plan or national policy. It does seek to encourage best practice.</p>
24 M Smith	<p>Should apply to small developments as well.</p>	<p>The Council considers that it has struck an appropriate balance between asking developers to address climate considerations in new development without unduly burdening smaller developments.</p>
26 Alex Lawton	<p>Does not go far enough, I think the proposed best practice objective are about right.</p> <p>However I am sceptical about the benefit of future proofing buildings to be zero carbon ready. In practice this may give developers a way to avoid best practice and leave homeowners with a bill to retrofit their property in future</p>	<p>The SPD cannot set policy which could only be achieved through a review of the local plan or national policy. It does seek to encourage best practice.</p>

		The intention of ‘future proofing’ buildings is to ensure that retrofitting is feasible and as cheap as possible in the future.
27 Bargate Homes	<p>It is acknowledged by the SPD that, in some instances, air-source heat pumps may not be available or viable for installation on any or all properties within a new residential development. In such instances, CCS 1e makes an allowance for a statement to be made setting out the works required to install a heat pump system in the future, including any associated building fabric and other upgrades necessary to ensure the occupier comfort in colder months. This is a welcome and pragmatic approach for specific instances. The same applies for CCS1f, which allows the option for purchasers to buy a property with a heat-pump pre-installation (in instances of financial unviability, for example).</p> <p>The approach endorsed by CCS 1b and CCS 2a is for air source heat pumps and PV solar arrays to be installed on all properties. One issue with this approach is that major new development may not have the capacity for both large PV arrays and heat pumps. We’ve consulted with Briary Energy (independent energy assessors) who have advised that many local providers confirm that this is the case on multiple developments already. With increased and much-needed uptake on these technologies, this issue may continue to occur, so it is welcome that allowances are made in the SPD for ‘best practicable outcomes’, discussed further below.</p>	<p>Comment noted.</p> <p>Comment noted.</p>
30 Stoford Developments Ltd	All our buildings systems work to reduce energy, such as motion/sunlight-controlled lighting, leak detection, air source heat pumps. Energy use is monitored through intelligent sub-metering and building management systems to provide live data, allowing occupiers to see where energy is being used. These measures further contribute to minimising the use of energy.	Comment noted. Examples of best practice are welcomed.
33 New Milton TC	About right but design and build process changes to meet higher development energy performance standards may discourage small developers.	The Council considers that it has struck an appropriate balance between asking developers to address climate considerations in new development without unduly burdening smaller developments which are often promoted by small developers.

<p>34 New Forest Friends of the Earth</p>	<p>“Secondary objectives: Where net zero carbon in operation cannot be achieved currently, buildings should aim to be zero carbon ready”</p> <p>NFFoE Comment: Too easy for developers to get out of any innovation for net zero carbon design. Suggest replace “should” with “shall”.</p> <p>“If a heat pump or other efficient low carbon heating system is demonstrably not practicable, or net zero carbon readiness cannot reasonably be achieved, the building should be future proofed: designed to reduce energy demand and CO2 emissions as far as is currently practicable, and to minimise the cost and disruption of retrofitting the building to run efficiently with a heat pump system in the future”</p> <p>NFFoE Comment: If the building can be retrofitted with a heat pump system in the future why is fitting it at the time of building not practical ? (Heat pumps are much easier to install at the onset than retrofitting).</p> <p>“If heat pump installation is demonstrated by appropriate evidence to be unfeasible on the grounds of financial viability, buyers purchasing off-plan should be given the opportunity to purchase from the developer heat pump system pre-installation at a discounted supplementary cost.”</p> <p>NFFoE Comment: Too vague, easy for developers to get out of heat pump installation. What is the criteria for heat pump installation to be unfeasible on the grounds of financial viability? The minimum percentage for the discounted supplementary cost for heat pump purchase by a buyer needs to be quantified.</p> <p>Outside flues (vertical through roofspace or horizontal walls) or chimneys are not mentioned in the SPD for design of new housing. These should not be allowed to be incorporated in new housing as it may encourage the retrofitting of carbon intensive gas boilers or highly polluting wood burning stoves by the buyer after purchasing. The flues are also very inefficient at reducing heat loss in the winter.</p>	<p>The SPD cannot set policy which could only be achieved through a review of the local plan or national policy. It does seek to encourage best practice.</p> <p>The installation of heat pumps cannot currently be required through Building Regulations and any requirement through planning policy would have to be achieved through a review of the local plan or national policy. The intention of ‘future proofing’ buildings is to ensure that retrofitting is feasible and as cheap as possible in the future.</p> <p>The presumption against chimneys as part of the design of new development may result in design that is not in accordance with local character in some instances.</p> <p>This issue will be addressed through the Building Regulations. The current Future Homes and Buildings Standards consultation</p>
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<p>35 Ringwood Town Council</p>	<p>These are excellent features of this SPD, but could go a bit further. Where a building cannot be made zero carbon in operation on site, consideration should be given to off-site alternative options. For example, fitting solar panels or heat pump technology to a community building. As a last resort, it could be a Grampian-type condition. ‘Future proofing’ need not apply.</p> <p>Also, it is our opinion that there should be no new building that cannot be adequately served by a heat pump system, given a ‘fabric first’ approach to energy efficiency. Even for a retrofit, there are not that many, and these tend to have protection issues, such as being a listed building, rather than a technical issue. Again, we suggest mitigation over permission.</p> <p>We would like to see more in the SPD about commercial developments and BREEAM Excellent certification beyond just water consumption for developments of 250-999 m2 GIA required by IMPL2.</p>	<p>The need for off-site options is likely to be relatively rare and the preference will be for on-site solutions. Whilst developers could propose an off-site option, the Council does not wish to specifically encourage this option.</p> <p>The SPD cannot require heat pump systems, although the current Future Homes and Buildings Standards consultation on proposed changes to the Building Regulations would mean that fossil fuel systems would not comply with Building Regulations.</p> <p>The SPD includes commercial development as can be seen in Table 1, albeit there are a couple of exceptions which apply to just residential development.</p>
<p>39 Fiddlesticks Farm</p>	<p>The scale of the Fiddlesticks Farm site, with up to around 140 dwellings and major open space, will enable economies of scale on materials, construction and land use, with greater potential to attain higher standards than the equivalent distributed over smaller sites.</p>	<p>Comment noted.</p>
<p>41 L Everitt</p>	<p>What level of electricity use should be expected in a dwelling? This information is already available via SAP tests but not necessarily clear to new residents.</p>	<p>Best practice ‘energy use intensity’ benchmarks are provided (35KWh per square meter per annum, calculated using gross internal area).</p>
<p>43 Natural England</p>	<p>It is acknowledged that the main purpose of the SPD is to provide guidance to prospective developers within the district. However, we recommend the Council also seeks to set targets to help existing development reach net zero,</p>	<p>Existing development is out of scope for this SPD which relates to new development, but could form part of future iterations of the</p>

	for example via a strategy for retrofitting measures (e.g. SuDS, green infrastructure, and energy/water efficient fixtures/fittings in Council owned stock). Public greenspace management can also be optimised to help address climate impacts as discussed above.	Councils Climate Change and Nature Emergency Strategy and Action Plan.
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On-site renewable energy generation (CCS2)

Q4. What are your views on the proposed best practice objective that new buildings should, wherever practicable, provide sufficient renewable energy generation on-site to run the building? [Agree/ Disagree / No comment or don't know]

From	Comment	NFDC Response
05 A Ford	Every effort should be made.	Comment noted.
09 R Palmer	Solar is cheap and an obvious choice for residential buildings.	Comment noted.
10 Chapman Lilley Planning	See earlier comments. Who checks it is installed, who checks it is working and producing the predicted energy savings and who checks to see if it is in place and working for the lifetime of the development?	It is expected that developers will check specifications on drawings have been implemented as shown on the drawing, as they will do for all aspects of the development. The LPA will monitor a sample of schemes being implemented and deal with any complaints in the usual way.
11 S Tonkin	Too many exemptions for eg heat-pump or solar PV pre-installation options.	The SPD cannot set policy which could only be achieved through a review of the local plan or national policy. It does seek to encourage best practice.
15 L Tonkin	The technology is available to make every house self-sufficient in energy now. This is what the standard should be, retrofitting should not be necessary.	The SPD cannot set policy to make every new house self-sufficient in energy which could only be achieved through a review of the local plan or national policy. It does seek to encourage best practice. The intention of 'future proofing' buildings is to ensure that retrofitting is feasible and as cheap as possible in the future.
19 New Forest East Constituency Labour Party	Yes, we totally agree. Again, this should be explicit in the policies.	Support welcomed.
20 Bloor Homes Southern	While Bloor homes supports the provision of renewable energy as part of new development this should be provided in the context of national guidance and	

	<p>Building Regulations. Furthermore the generation target 120kWh/yr/m2 of building footprint is not considered deliverable.</p> <p>The 2025 FHS consultation due this year is expected to require homes to achieve a 75-80% carbon reduction beyond Part L 2013. This is likely to require new homes to include the provision of low carbon heating, such as heat pumps, alongside Solar PV to provide onsite energy generation. While the Energy Act allows Council's to set energy targets beyond policy, the Governments Future Homes Standard Consultation in 2019, notes, 'as we move to ever higher levels of energy efficiency standards for new homes with the 2021 Part L uplift and Future Homes Standard, it is less likely that local authorities will need to set local energy efficiency standards in order to achieve our shared net zero goal.'</p> <p>With regards to the renewable energy target of 120kWh/yr/m2 of building footprint we do not believe this is an achievable objective. For context below a worked example is included</p> <p>Example – 90m2 three bedroom house Footprint 45m2 Energy demand required – 5,400kWh/yr Energy generated / kWp of Solar – 850 kWh/kWp System size required– 6.4kWp Area of PV /kWp – 5m2/kWp Area of PV required – 32m2</p> <p>As set out to meet this target on a typical three bedroom house would require around 32m2 of PV. A typical three bedroom house has c.32m2 of roof space, reducing to c.24m2 of available space when taking into account areas around the edge of the system. This is significantly less than the roof area required.</p> <p>Other development types may include dormer windows, roof lights etc to provide a mix of design which is keeping with the design and character of the area, setting this best practice requirement will stifle design and the character of development.</p> <p>In addition, as a housebuilder Bloor Homes only has the ability to influence the regulated energy demand of homes through design and specification of materials and systems and renewable energy technologies. The unregulated energy consumption, (often referred to as 'plug in load') of homes is ultimately</p>	<p>The target to provide renewable capacity for the total operational energy requirement is a target not a requirement. If the achievable renewable energy generation capacity is below this then it should be expressed as a percentage of the total operational requirement and a justification will need to be provided if less than the regulated operational energy use.</p> <p>Comment noted. Developers are not being asked to control the future unregulated energy consumption but to ensure that sufficient generation capacity will be provided to meet likely demand. The suggested change would mean that the best practice objective would be unlikely to achieve</p>
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ANNEX 1 – Version for PLACE & SUSTAINABILITY OVERVIEW & SCRUTINY PANEL

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	<p>the function of the residents use of the building, which cannot be influenced by the developer and therefore the requirement on the developer to offset emissions from residents unregulated energy use is not appropriate. In this context we would revise Policy CCS2 as below, further amending Part 2b in line with these proposed changes.</p> <p>2. On-site renewable energy generation Best practice objectives: On-site renewable energy generation should be provided wherever it is practicable to do so, wherever possible sufficient to at least meet the regulated energy use of the development to achieve net zero carbon development in operation.</p>	renewable energy generation that could meet total operational demand.
21 R Kent	If possible, buildings should be net energy generators. But again, this should be covered by national policy, not local policy.	Comment noted.
22 M Humber	Every building should have solar panels. There could be group underground heat source pumps. Large triple glazed windows a high standard insulation means heat is preserved. Large window facing south will provide heat. A passive house would be self-sufficient.	The SPD cannot set policy to require solar panels which could only be achieved through a review of the local plan or national policy. It does seek to encourage best practice.
27 Bargate Homes	<p>A renewable energy generation calculation target of 120kWh / year per sqm is set by the SPD. This is a calculation of the renewable energy that will be generated on-site, in total, per building and per sqm of building development footprint.</p> <p>The figures produced are then expressed as a percentage of the best practice target of 120 kWhm²/year, and as a percentage of the building operational energy use (EUI) calculated for the CCS. If the onsite renewable energy generated is below the predicted annual regulated operational energy use, there needs to be a justification that the best practicable outcome has been achieved for the development proposed.</p> <p>This approach is supported and allows room for good outcomes which may not quite meet the targets prescribed in the SPD, so long as they are justified.</p> <p>One additional item to consider is the relationship between maximising dwelling sustainability and high-quality urban design. The Council's ambitions</p>	<p>Comment noted and support welcomed.</p> <p>In this circumstance occurs the developer can articulate its reasoning in its climate change statement/design and access statement. The National Model Design Code</p>

	for both good design and climate improvements should not contradict. For example, if the guidance set out in this SPD forces houses to be designed to a certain orientation to ensure energy efficiency targets are reached, this could make for a contrived street scene which conflicts with the strong design focus that the Council also pursue. Allowance within the SPD for such 'overlaps' should be acknowledged.	recognises the environmental performance of place and buildings to ensure they contribute to net zero targets as part of the baseline standard of quality and practice. SPD to be amended to clarify this point.
30 Stoford Developments Ltd	In respect of requirement 2 'On-site renewable energy generation', Stoford include on-site renewable energy through the use of PV panels to the roof of our buildings. The roof is the prime location for the panels, as you already have the structure in place, second tier locations would be the car parks, but you have to build the support frames over the car spaces, which in turn increases the overall carbon. As standard we provide an area of PV panels to generate sufficient electricity to power the to the baseline operational energy demand for the base build, this system is battery enabled to allow for energy storage. The user of the building can then add additional PV panels and batteries to suit their operational energy demands. It is important to note, that it isn't possible for the on-site renewable generation to match the actual total electric use, unless you have fields of PV. In time as the grid decarbonises, and the user chooses renewable energy tariffs the building will be truly net zero carbon in operation.	Comment noted.
31 Persimmon Homes	See earlier comments. Who checks it is installed, who checks it is working and producing the predicted energy savings and who checks to see if it is in place and working for the lifetime of the development?	It is expected that developers will check specifications on drawings have been implemented as shown on the drawing, as they will do for all aspects of the development. The LPA will monitor a sample of schemes being implemented and deal with any complaints in the usual way.
34 New Forest Friends of the Earth	If PV installation is possible, the developer should be mandated to provide a minimum. It will then be easier for the buyer to add further panels at a discounted price (which should be quantified) as the inverter and connections to the grid will already be in place when the house is first being wired. All new homes should have PV installed on their roofs, no matter what the orientation. There are many hours of solar gain east facing in the morning as well as west facing the rest of the day. These can then provide energy for heat pumps (where appropriate) and Mechanical Ventilation with Heat Recovery (MVHR).	The SPD cannot set policy to require PV installation which could only be achieved through a review of the local plan or national policy. It does seek to encourage best practice.

	<p>This SPD makes no mention of energy storage using lithium ion cells, which is rapidly reducing in price on the back of the burgeoning electric car industry. NFFoE supports energy storage as it can even out the energy peaks particular at the winter evening times when the most environmentally coal and gas generation is required. For any new PV installation the developer should also offer energy storage systems at a quantified discounted price.</p> <p>No mention of energy storage (lithium ion cells) to store excess solar power generated during the day.</p>	<p>The toolkit refers to ‘smart controls and demand flexibility’, ‘intuitive & flexible energy use’ and ‘energy storage’ rather than batteries. Add text at new para 92 to refer to this.</p>
35 Ringwood Town Council	<p>Where a building cannot be made zero carbon in operation on site, consideration should be given to off-site alternative options. For example, fitting solar panels or heat pump technology to a community building. As a last resort, it could be a Grampian-type condition. ‘Future proofing’ need not apply.</p>	<p>The need for off-site options is likely to be relatively rare and the preference will be for on-site solutions. Whilst developers could propose an off-site option, the Council does not wish to specifically encourage this option and could not require it under current local plan policy.</p>
39 Fiddlesticks Farm	<p>The scale of the Fiddlesticks Farm site, with up to around 140 dwellings and major open space, will enable economies of scale on materials, construction and land use, with greater potential to attain higher standards than the equivalent distributed over smaller sites.</p>	<p>Comment noted.</p>
41 L Everitt	<p>Every public building should have facilities to create enough of its own electricity. What level of the renewable energy generated should residents expect to be able to return to the national grid?</p>	<p>This will vary from property to property, based on factors including the amount and unit efficiency of PV or other renewable installation, property aspect to the sun, and the level of consumption in the home including whether and how often the occupants charge an EV.</p>
42 P Stickley	<p>What is NOT entrenched is the entirely wasteful and energy-intensive - and therefore by implication, un-green - way in which developers at any level assume that when they connect 150 houses to the mains gas, electricity, BT lines, drainage, and water supply, that no other building or people nearby will be adversely affected by the quality of the service to which they have become used, and will be unlikely to be able to recall in the future. The invasive nature</p>	<p>Comment noted – the matters raised appear to be beyond the scope of this SPD and the change being requested is not clear.</p>

ANNEX 1 – Version for PLACE & SUSTAINABILITY OVERVIEW & SCRUTINY PANEL

	<p>of all of these services in the areas of highways being fitted with trenches - which ALWAYS seems to go on as everything else and everyone else wants to use THAT road - is such that they use huge amounts of energy, normally consuming hydro-carbons and emitting CO2 in huge volumes; there is the added hazard of in-situ refuelling as well. All of this is undertaken at great speed to keep the cost down - but who measures the Enviro-cost? Such operations are often and normally undertaken AFTER the building of houses has started, and causes considerable inconvenience for existing home owners in the area in a huge number of ways.</p>	
<p>44 Cranbourne Chase AONB</p>	<p>This AONB encourages roof mounted PVs for the capture and utilisation of solar energy where there are not Listed Building or Conservation Area issues. We are much less enthusiastic about field scale PVs.</p>	<p>Comment noted.</p>

Reducing embodied carbon emissions (CCS3)
 Q5. What are your views on the proposed interim best practice objective that developers take all practicable steps to reduce carbon embodied in construction processes?

From	Comment	NFDC Response
05 A Ford	There should be legal compulsion for developers to reduce embodied carbon	The SPD cannot set policy to require developers to reduce embodied carbon which could only be achieved through a review of the local plan or national policy. It does seek to encourage best practice.
10 Chapman Lilley Planning	See previous comments - at application stage, the constructor and the construction process is not often known.	Developers should be considering such matters at design stage prior to applying for planning permission. This is being encouraged as best practice and is not a requirement. If the developer does not wish to include information on carbon emissions it cannot be compelled to do so, although it would need to state this in its climate change statement.
11 S Tonkin	Too many exemptions to best practice compliance.	The SPD cannot require developers to deliver best practice, although it can encourage it through the requirement to prepare a climate change statement.
12 B Lord	Absolutely essential and the sooner the better.	Comment noted.
14 A Elliott	I agree with this proposed interim best practice, but this needs to be monitored closely.	Comment noted.
15 L Tonkin	It will be ignored by the developers. Development should be zero carbon, zero energy now.	The SPD cannot set policy to require development to be zero carbon which could only be achieved through a review of the local plan or national policy. It does seek to encourage best practice.
18 D Orme	The most important factor is forcing developers to incorporate excellent insulation, this is more important than carbon reductions per se.	Comment noted – this is covered under CCS1.

<p>19 New Forest East Constituency Labour Party</p>	<p>This seems reasonable. An emphasis on sourcing from British suppliers and manufacturers would make this easier and accelerate the objective.</p>	<p>Comment noted – use of British suppliers would be relevant to calculation of the transport elements of building material and products. P36 of the draft SPD identifies ‘Use local materials and suppliers’.</p>
<p>20 Bloor Homes Southern</p>	<p>Currently the Building Regulations do not set a specific requirement for embodied carbon. A number of guidance documents including the LETI Design Guide and RIBA 2030 Climate Challenge strategy set out potential embodied carbon targets, however the potential deliverability and viability of tackling embodied carbon is largely unknown at this stage. The London Plan which typically sets out targets ahead of other Local Authority plans currently only requires developers to assess embodied carbon and does not yet set any specific targets. Bloor Homes are exploring the impact of embodied carbon as part of the first step in reducing this impact and we support the Council’s objective for development to assess and reduce embodied carbon where feasible and viable. At this stage we would be cautious about setting specific embodied carbon targets until further information on the feasibility, deliverability and viability of potential targets have been considered.</p>	<p>Comment noted – the SPD does not set targets but asks developers to assess embodied carbon and demonstrate that they are taking active steps to reduce it.</p>
<p>21 R Kent</p>	<p>Meaningless without checks & enforcement. And checks and enforcement won't happen.</p>	<p>This element of the SPD is a best practice objective that the Council is seeking to encourage but it is not a requirement which could only be achieved through a change in policy in the local plan or nationally.</p>
<p>22 M Humber</p>	<p>It does it go far enough. At the rate proposed NFDC would never reach carbon zero or the government’s targets. Time is of the essence and the policy should be clear and straightforward. Enforce policies with penalties for only doing bits or a little at a time. It should be mandatory and penalties imposed if a post build inspection shows it does not do what they said it would. Time is running out for our planet. The United Nations says it as it is. Let’s get it right for the Forest.</p>	<p>Comment noted – however, the SPD can only supplement existing policy. New policy could only be achieved through a review of the local plan or nationally.</p>
<p>26 Alex Lawton</p>	<p>I think this is a reasonable objective and should help with more responsible use of resources and more long-term approach to design.</p>	<p>Comment noted.</p>

<p>27 Bargate Homes</p>	<p>Bargate Homes absolutely agree that reducing embodied carbon in design and construction is vital to improving the built environment and reducing the carbon footprint of the housebuilding industry.</p> <p>However, this is largely outside the developers control and effectively a 'Grampian condition' and a potential impediment to development to add to the wider environmental issues currently required. On this basis, we request that the SPD hopefully creates an incentive to fast-track such changes from providers / developers or provide a transitional period to allow new development to still come forward in a timely way (discussed further below).</p> <p>Climate Change Statements are also expected to identify and describe any steps that have been or will be taken to reduce carbon emissions from the construction process up to the point of practical completion. Such assessments would generally be carried out in accordance with RICS guidance on how to calculate the carbon associated with the whole life cycle of the development from inception to demolition. A full assessment would also be carried out on the material selection that includes data on carbon taken to produce the materials, deliver to site, and so on.</p> <p>This will incur considerable costs for developers and applicants, as well as then implementing changes, such as coordinating the changes to the build and potentially changing build products: e.g. higher recycled quants in any concrete, steel, blocks etc.</p>	<p>This element of the SPD is a best practice objective that the Council is seeking to encourage but it is not a requirement which could only be achieved through a change in policy in the local plan or nationally. The Council is unlikely to be in a position to be able to refuse development if embodied carbon calculations are not included in the climate change statement, however, provision of this information will help assessment of the proposed development against adopted local plan policies STR1 & ENV3.</p>
<p>30 Stoford Developments Ltd</p>	<p>From the design stage we review the construction materials to assess where we can reduce the embodied carbon, targeting the main sources of carbon in construction which are concrete, steel, and building services plant. Common examples of this type of carbon reduction include adding pulverised fuel ash into concrete mix, or sourcing steel with a higher recycled content. Materials are sourced from manufacturers holding Environmental Product Declarations (EPDs) wherever possible to see that they are responsibly manufactured and supplied.</p> <p>Using third party independent assessors (such as PlanetMark) we carry out a whole life carbon assessment (stages A1 to A5). This assessment provides the embodied carbon for the scheme, which can then be offset by purchasing</p>	<p>Comment noted.</p>

	credits from an approved carbon offset scheme. However, these offset credits are open for projects that do not benefit the local community and environment, we and other companies are looking at how the monetary value of the offset credits can instead be funnelled into local schemes that have a direct local benefit, which are easier to monitor (i.e. you can see photo voltaic (pv) panels being erected on the local school, rather than a mango plantation thousands of miles away). This is a more efficient use of the money.	
31 Persimmon Homes	<p>See previous comments - at application stage, the constructor and the construction process is not often known.</p> <p>These requirements place additional burdens upon the applicant with no realistic benefit - and they will not be checked by the LPA during the construction process in any event, and as explained above, upon occupation and over time, the use of the building and curtilage will alter as it is adapted by the occupier.</p>	<p>Developers should be considering such matters at design stage prior to applying for planning permission.</p> <p>This is being encouraged as best practice and is not a requirement.</p> <p>If the developer does not wish to include information on carbon emissions it cannot be compelled to do so, although it would need to state this in its climate change statement.</p>
33 New Milton TC	This will only be fully measurable if site visits during construction take place specifically to collect information, from all development types. We feel however this is unachievable with current resources as they are, so seems pointless in compelling the developer without potential repercussion.	This element of the SPD is a best practice objective that the Council is seeking to encourage but it is not a requirement which could only be achieved through a change in policy in the local plan or nationally.
34 New Forest Friends of the Earth	<p>Passivhaus contradicts the embodied carbon criteria because it encourages the use of energy guzzling building methods although good for keeping down operational carbon.</p> <p>Embodied carbon is emitted from energy consumed during construction, including the production and transportation of building materials - processes developers have some ability to control or influence. Thereafter embodied carbon also arises from periodic maintenance and ultimately from building demolition and waste disposal processes (net of any carbon savings from materials that can be recycled and any energy that can be recovered from residual waste).</p> <p>Although the Code for Sustainable Homes was very frustrating for self-builders, as it was a one-size fits all checklist, it gave excellent rules for constructors and all large developments should follow the requirements for low energy construction and transportation.</p>	<p>Comment noted – as the Code for Sustainable Homes is an historical document it would not be appropriate for the SPD to refer to it. The Council considers that the approach outlined in the SPD encourages best practice with respect to embodied carbon without introducing new policy requirements which could only be achieved through a review of the local plan or national policy.</p>

ANNEX 1 – Version for PLACE & SUSTAINABILITY OVERVIEW & SCRUTINY PANEL

35 Ringwood Town Council	This is an excellent concept, although very hard to measure accurately. Government models in this area sacrifice accuracy for simplicity. The suggested list of preferred materials is very welcome for small-scale builders of individual dwellings or small developments that are inexperienced in this area. The threshold of developments of 50+ dwellings/1000 sqm GIA seems too high. For housing, the threshold could be 10+ dwellings. For non-domestic builds, as these tend not to be bespoke, crude calculation is relatively facile and methodology is freely available. It is suggested that the threshold is dropped to 250 sqm.	The SPD cannot introduce new policy and is seeking to encourage best practice. All major development is encouraged to reduce embodied carbon but a threshold of 50 dwellings and 1,000 sqm GIA is included where the calculation of embodied carbon is encouraged to be included in the climate change statement. This is to avoid creating an additional burden on smaller developments.
39 Fiddlesticks Farm	The scale of the Fiddlesticks Farm site, with up to around 140 dwellings and major open space, will enable economies of scale on materials, construction and land use, with greater potential to attain higher standards than the equivalent distributed over smaller sites.	Comment noted.

Sustainable travel (CCS4)

Q6. What are your views on the proposed requirements to help encourage more sustainable travel (note: these should be read alongside the general requirements set out in Local Plan policy CCC2: Safe and Sustainable Travel, summarised in Appendix 1).

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From	Comment	NFDC Response
09 R Palmer	Agree that ensuring that sufficient, secure bike storage is provided is crucial to increase confidence and convenience for people to cycle more. The same is true for EV charging, for which the majority of people will be able to and want to charge at home - this is the cheapest form of charging a vehicle.	Comment noted.
10 Chapman Lilley Planning	As a regular and keen cyclist - I would not leave my bike in an outside store for both security and practical / maintenance reasons so do not see the point in providing one in a detached / semi / terrace dwelling. Has the LPA assessed the usage of such facilities where provided to see if they are used or valued by the occupants? if not it may be a useful exercise to assess the value of such external provision.	Comment noted, although the draft SPD does not suggest provision in an outside store other than in an illustrative diagram at paragraph 40. Chapman Lilley Planning can propose alternative arrangements should it so wish.
11 S Tonkin	No commitment to improve public transport which, at present, is so poor that it does not meet the needs of the majority of NFDC's residents.	Improving public transport is beyond the scope of the SPD and is outside the control of New Forest District Council and developers in most circumstances.
13 A Witt	In order to reduce car use in a rural area it's vital that adequate provision for alternatives are made. This should include building a network of cycle paths between developments and local services. Where practical this network should be linked (e.g. enabling safe cycling between say Ringwood and Fordinbridge). In addition to active travel there must be a long-term commitment for public transport, perhaps applying to developments over a certain number of dwellings	Comment noted – Hampshire County Council is responsible for transport planning, including walking and cycling and public transport provision. Any new policy for developers to provide for public transport could only be achieved through a review of the local plan or national policies.
15 L Tonkin	The only way to meet this criteria is to make the housing in a settlement for local people only.	Comment noted – although this would be beyond the scope of the planning system.
18 D Orme	Very weak section. Providing adequate infrastructure to enable widespread active travel is vital for sustainability, reducing use of fossil fuels, and improving the health of the New Forest population.	Improving public transport is beyond the scope of the SPD and is outside the control of New Forest District Council and developers in most circumstances.

<p>19 New Forest East Constituency Labour Party</p>	<p>The BHL document mentions developments should be in areas with good local facilities and services to minimise travel. There appears to be limited information on who is responsible on ensuring this. Is it the developer or the local authority? How would this work with GP mergers and local pharmacy closures for example? This statement lacks a local link to the New Forest.</p>	<p>Location of development is more a matter for the local plan and outside the scope of this SPD which is focused on the detail of the building rather than the principle of development.</p>
<p>20 Bloor Homes Southern</p>	<p>The Building Regulations update in 2022 introduced Part S which sets out electric vehicle charging requirements for new residential and non-residential buildings. In the context of approved national guidance, we would recommend Part 4a is updated as below to take this into account. CCS 4a: Cycle parking and EV charging (all development): At property level provide secure and accessible cycle parking capacity sufficient for the number of occupants/users likely to be present, along with EV charging in line with the requirements of Building Regulations Part S.</p>	<p>The SPD seeks to encourage provision above the minimum requirements of the Building Regulations as best practice. It is not a requirement and if developers wish to provide the minimum that the Building Regulations require this will need to be stated in the climate change statement.</p>
<p>22 M Humber</p>	<p>We should be able to walk or cycle within a twenty minute journey for shopping, banking, schooling and hospitals. We should have more passenger transport (even in rural areas), or Community Transport Schemes. Safe cycling and walking routes should be prioritised.</p>	<p>Comment noted – Hampshire County Council is responsible for transport planning, including walking and cycling and public transport provision.</p>
<p>30 Stoford Developments</p>	<p>In respect of requirement 4. ‘Sustainable travel’ our employment sites include Electric Vehicle (EV) charging points at 10% of all car parking spaces with a further 10% ducted for future expansion. We provide convenient, covered, and secure cycle storage (with integrated green roofs, and insect nesting structures, and external seating/garden/wellbeing areas for relaxation. On our larger sites we have included shower facilities to further encourage people to walk or cycle to work. For each site we also prepare and submit a Travel Plan that sets out measures to reduce the need for people and goods to travel to and from the site and to facilitate and encourage people to travel more sustainably. Our site is located within 1 mile of the north Totton strategic site (ref SS1), which is allocated for a minimum of 1,000 homes and community focal point in the Local Plan 2020. Bloor Homes have secured outline planning permission for the northern part of the allocation and a reserved matters application, pursuant to the outline consent is pending consideration. A further outline planning application for a large proportion of the southern allocation is awaiting determination. As a result of this development site and the wider Totton area a large pool of potential labour and convenience retail</p>	<p>Comments noted – although these would need to be considered through the local plan review and are out of scope for the SPD.</p>

	<p>facilities are / will be within walking / cycling distance of our site, reducing the reliance on the private car. There is a bus stop on the A36, adjacent our site which provides hourly bus services (X7 and X7R) between Salisbury to Southampton via Alderbury, Whiteparish, Wellow or Romsey, Ower, Totton. The location of the site, on junction 2 of the M27, with direct access on to the strategic road network, lends itself to employment uses that would importantly reduce the need for commercial traffic to travel through the rural parts of the district.</p>	
31 Persimmon Homes	<p>Many members of staff are regular and keen cyclists who advise that they would not leave their bikes in an outside store for both security and practical / maintenance reasons, so would question the point in providing one in a detached / semi / terrace dwelling. Has the LPA assessed the usage of such facilities where provided to see if they are used or valued by the occupants? if not, it may be a useful exercise to assess the value of such external provisions.</p>	<p>Comment noted, although the draft SPD does not suggest provision in an outside store other than in an illustrative diagram at paragraph 40. Persimmon Homes can propose alternative arrangements should it so wish.</p>
33 New Milton TC	<p>About right. There are so many other considerations besides Planning to make sustainable travel achievable. Providing cycle-aware driver training in workplaces and beyond, and stopping the ban of electric scooters on South Western Railway are just the start!</p>	<p>Comments noted.</p>
34 New Forest Friends of the Earth	<p>No mention of public transport. Developments must be in easy walking or cycling distance of public transport to provide a frequent and reliable service to popular centres for shopping, work and leisure.</p>	<p>Public transport is referenced in CCS4 where the best practice objective is 'To minimise the need to travel, and to optimise opportunities to travel when needed by active and public transport modes, or by electric vehicle.'. It is likely that transport considerations will be assessed through the Design and Access Statement, Transport Assessment or Travel Plan for the site rather than information in the climate change statement.</p>
35 Ringwood Town Council	<p>What is included is very good. However, it would be possible to strengthen certain aspects. On EV charging, garages and carports could be fitted with PV arrays to offset EV energy usage. A 2kW system could generate the equivalent per year of around 8000 miles in an EV. Owners without an EV could benefit from grid feed-in tariffs.</p>	<p>Comments noted and support welcomed. Renewable energy generation is covered under CCS2. This part of the SPD to be amended to flag the opportunity to install solar PV on garages or car ports.</p>

ANNEX 1 – Version for PLACE & SUSTAINABILITY OVERVIEW & SCRUTINY PANEL

	<p>Also, large developments (50+ dwellings) should provide open access facilities of, say, 1 charge unit for every 10 dwellings or 1000m2 non-domestic floor area. Note that the Greencore Construction site pictured on p45 has this facility and also an electric vehicle available for residents to book using an online app. It can and is being done elsewhere.</p> <p>Some extra clauses covering public transport would be welcome, such as on-site bus stops with electronic display boards for developments of 50+ dwellings.</p>	<p>Amend SPD to reflect potential to provide visitor facilities on large sites.</p> <p>The provision of public transport infrastructure would be considered under the transport policies of the adopted local plan.</p>
39 Fiddlesticks Farm	<p>The site is in a sustainable and accessible location at the main town of Fordingbridge, helping to reduce the need to travel and promoting modal shift away from the private car.</p>	<p>Comment noted – although a matter for the local plan review and out of scope for this SPD.</p>
41 L Everitt	<p>New homes should show where locations of commutable places to travel to without a car. They should detail cyclable distances such as Romsey, and Southampton.</p>	<p>Willingness to cycle and feasible cycling distances would vary from person to person. Cycle (and walking) accessibility would be considered when sites are allocated for development, and in more detail in planning application transport assessments.</p>
42 Paul Stickley	<p>There is the question of schoolchildren and education generally. There has been much said about the state of schools in this area. People are simply pouring into SW Hampshire, and many young couples are buying new houses. Who can blame them? They can often afford it, the Bank of Mum and Dad gives them a free loan, and Bob's your uncle; they move in. Next, of course, a baby starts to appear. Where will the child be able to attend as a crèche, playschool or primary school? "Sorry folks, the school is full to overflowing and we have a waiting list with over 100 children wanting to start in Year One." Now multiply this factor in the equation by the number of houses about to be built in my home village alone, and you have a situation where across the area, parents are delivering their child/children to schools well outside the centre of habitation, probably passing thousands of other parents doing the same thing, but in the opposite direction. Is this really helping to keep our country GREEN? I do not think so. The school should be of a size and capacity which reflects the size of the village or town, and not be an old building which has multiple built-on extensions which outdo the original size of the school many times, at the expense of green spaces, playing fields, parking areas for staff (if there are any in the first place) and parking for</p>	<p>Comments noted – although beyond the scope of the SPD.</p> <p>Hampshire County Council is responsible for school provision and transport planning, although restricted by national policies around school choices.</p>

	<p>visitors; recreation areas and physical recreation areas which are outside. The lack of parent parking areas in most schools is very noticeable and deplorable, and an indictment of the way in which education sites are, and have been treated over many years. Parking on a roadside near a school is a potentially life-risking activity. It becomes much more dangerous when the mother/father is carrying a second child, or a third. I leave it to your imagination. When the Coroner gets hold of the valid information relating to the cause of death, it would not look very good for the school's care policy for visitors to the school.</p> <p>This cannot be allowed to go on, not here in the New Forest, not here in Hampshire, nowhere in the UK. It is a disgrace and an embarrassment to the residents of the country. With a rapid and continuously increasing population, town planning has become even more important, so that those of us who are lucky enough live here already can have a healthy, wholesome lifestyle, and our children can be educated in places which are not overcrowded, to which they can walk easily.</p>	
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Avoiding overheating (CCS5)

Q7. What are your views on the proposed best practice objective that developments are designed to enable urban cooling and to reduce overheating risks?

From	Comment	NFDC Response
10 Chapman Lilley Planning	<p>Landscaping and surfacing is almost inevitably changed / altered / removed /replaced by the building occupants - quite often within the first few years of occupation, therefore the additional burden of having to provide a statement as to how this has taken into account heatwave mitigation is not necessary.</p> <p>What is the justification for requiring that Building Regulations requirements for water consumption are exceeded? How are you going to check this?</p>	<p>The Council considers that provision of appropriate landscaping and surfacing is an important factor in avoiding overheating and heatwave mitigation, notwithstanding the lack of control over future alterations by occupants.</p> <p>The New Forest district falls within a wider area of water stress as identified by the Environment Agency. Southern Water is championing Target 100 to support personal consumption reductions to achieve a 100 litres per person per day standard. This can be achieved by more efficient water fittings and appliances, rainwater harvesting and/or grey water recycling. This is something that developers are being encouraged to do to help adapt to climate change but would not currently be a requirement.</p>
11 S Tonkin	No heatwave mitigation for developments of <10 homes.	Whilst mitigation for overheating of individual properties is relevant for smaller scale development it would be more difficult to provide meaningful heatwave mitigation on a smaller site.
13 A Witt	It's vital that street-based cooling such as mature trees are maintained and enhanced. This may require a reduction in on-street parking, creation of low-traffic neighbourhoods, and implementation of one-way systems in towns where it's practical.	Comments noted.

14 A Elliott	Does not go far enough. I am really pleased to see this included, but retrofitting old homes needs to be taken as people can die from excessive heat in their home. NFDC should undertake a survey of all properties and prioritise mitigations or retrofits from excessive heat urgently. It's all very well applying the best practice objective to new builds, but what about old builds? I also think this should be made statutory.	Comment noted, although retrofitting is beyond the scope of this SPD which relates to the development of new buildings.
15 L Tonkin	Does not stipulate a requirement for the sort of mitigation that would ensure that overheating doesn't happen.	The SPD cannot introduce a policy requirement but can encourage developers to address overheating mitigation in a climate change statement.
20 Bloor Homes Southern	<p>Increasing summer temperatures is a key consideration for new development and Bloor Homes designs buildings to limit the potential for overheating, prioritising passive measures to reduce the risk of overheating. This includes the consideration of how the development layout, landscaping, planting etc can be optimised.</p> <p>The 2022 update of the Building Regulations included the introduction of Part O, overheating which sets out pathways to consider the overheating of buildings, taking into account the impacts of overheating, this includes an assessment option using dynamic thermal modelling. As a minimum all development will be required to design and assess buildings in line with Part O, additional assessment in line with other guidance (GHA) is not considered necessary. In this context we recommend that Part 5b is amended as below.</p> <p>CCS 5b: Overheating (all residential development)</p> <p>For residential development complete overheating assessment in line with Part O of the Building Regulations and reporting on measures included to minimise and reduce overheating risks as part of the design of homes.</p>	The Council is trying to encourage developers to go beyond the basic requirements of the Building Regulations and ensure that overheating is avoided as much as possible through the design and layout of development.
22 M Humber	This Policy should be compulsory.	The Council cannot introduce new policy requirements through an SPD, this can only be achieved through a review of the local plan or national policy, but is trying to encourage developers to go beyond the basic requirements of the Building Regulations and ensure that overheating is avoided as much as possible through the design and layout of development.

<p>26 Alex Lawton</p>	<p>The proposals seem reasonable from a building design point of view but they do not mention the importance of plants and trees in cooling and shading. I realise this may be indirectly covered by ecology guidelines but is it worth stressing the importance of existing mature trees and newly planted trees in cooling the immediate surroundings?</p>	<p>Comment noted. The SPD currently refers to planting strategies as a best practice objective to avoid overheating and CCS 5b on p24 requests description of how heatwave mitigation has informed the planting and landscaping strategy. The SPD will be amended to reflect the importance of trees and plants in helping to provide heatwave mitigation in the best practice section on p35. N.b. link to Good Homes Alliance Overheating in New Homes checklist at para 85 does not appear to work.</p>
<p>27 Bargate Homes</p>	<p>Bargate Homes are already meeting new requirements within Part O of the Building Regulations 2010 (Overheating) on other sites that they are bringing forward. It's acknowledged that this is an important issue. NFDC's draft SPD also includes the need for an assessment of 'natural heatwave mitigation' in relation to planting and landscaping strategies. The design issue referred to above, regarding the orientation of dwellings, is reiterated*.</p> <p>*(The Council's ambitions for both good design and climate improvements should not contradict. For example, if the guidance set out in this SPD forces houses to be designed to a certain orientation to ensure energy efficiency targets are reached, this could make for a contrived street scene which conflicts with the strong design focus that the Council also pursue. Allowance within the SPD for such 'overlaps' should be acknowledged.)</p>	<p>Comment noted.</p> <p>In this circumstance occurs the developer can articulate its reasoning in its climate change statement/design and access statement. The National Model Design Code recognises the environmental performance of place and buildings to ensure they contribute to net zero targets as part of the baseline standard of quality and practice. SPD to be amended to clarify this point.</p>
<p>30 Stoford Developments Ltd</p>	<p>In respect of requirement 5. 'Avoiding overheating' we design a highly efficient thermal envelope centred around high levels of insulation, airtightness, solar shading, and glazing selection to reduce heat transmission. This combines to reduce the amount of energy required to heat and cool the buildings.</p> <p>As our plans for the site progress, we will seek to orientate the offices within our development appropriately to prevent overheating. If this is unavoidable, we will plan to incorporate a form of solar shading such as brise soleil to minimise the need for cooling.</p>	<p>Comment noted.</p>

ANNEX 1 – Version for PLACE & SUSTAINABILITY OVERVIEW & SCRUTINY PANEL

31 Persimmon Homes	Landscaping and surfacing is almost inevitably changed / altered / removed /replaced by the building occupants - quite often within the first few years of occupation, therefore the additional burden of having to provide a statement as to how this has taken into account heatwave mitigation is not necessary.	The Council considers that provision of appropriate landscaping and surfacing is an important factor in avoiding overheating and heatwave mitigation, notwithstanding the lack of control over future alterations by occupants.
35 Ringwood Town Council	Very sensible suggestions. The use of the Good Homes Alliance tool is welcome.	Comment noted.
43 Natural England	Point 5 'Avoiding Overheating' is the only part of the CCS that mentions green and blue infrastructure provision, however, this aspect is not well explored within the supporting text within part B or C of the SPD. The Climate Change SPD is the ideal place to emphasise in detail the (multiple) benefits of well-designed GI in combatting climate change, and it should serve as a key local policy driver in encouraging developers to maximise the amount of GI incorporated into development design.	Comment noted – SPD to be amended to include a reference to the Partnership for South Hampshire's Green Infrastructure Strategy and Green Infrastructure Implementation Plan. This guidance is not repeated in the SPD.

Flood risk reduction and sustainable urban drainage (CCS6)
 Q8. What are your views on the proposed best practice objective to naturally and safely manage surface water run-off, including under extreme climate conditions.

From	Comment	NFDC Response
05 A Ford	Don't build on flood plains or near rivers.	Comment noted – location of development and flood risk policy are matters for the local plan review.
11 S Tonkin	There should not be SUDs exemptions for small developments.	Comment noted – SPD to be amended to encourage SUDS on smaller developments.
12 B Lord	It should be obligatory to construct large volume underground RWC structures/cisterns whenever ground is levelled to replace a building or within any new build site.	The SPD can only supplement adopted local plan policies. The suggested requirement is not currently within local or national policy and could only be achieved through the local plan review or change to national policy. However, the suggested requirement could form part of an approach to SUDS which would prevent flooding and reduce water consumption.
13 A Witt	The requirements around nitrogen and phosphate pollution in local river catchments needs greater focus. Nutrient mitigation schemes should be a last resort as these do little to reduce overall pollution and by effectively "exporting" pollutants - e.g. to the Isle of Wight as per the recent agreement - there is a risk that watercourses close to developments suffer increased pollution and reduced biodiversity	Comment noted although beyond the scope of the SPD.
15 L. Tonkin	Stop building in areas prone to flooding.	Comment noted – location of development and flood risk policy are matters for the local plan review.
17 Southern Water	Whilst not in line with current legislation, Southern Water would encourage a requirement for SuDS features to be included all new development, including both minor as well as major applications. We support any requirements which seek to ensure that surface water is appropriately managed, as close to source as possible. This would align with our own work to address problems caused by excess surface water in our sewerage	Any new planning policy requirement would have to be achieved through a review of the local plan or change to national policy. SPD to be amended to encourage SUDS on smaller developments.

	<p>network in order to protect water quality in rivers and sea (more information on the work we are doing is on our webpage https://www.southernwater.co.uk/our-performance/storm-overflows/clean-rivers-and-seas-task-force).</p> <p>Historically, the sewer network was designed to accommodate both surface water and foul flows in the same pipe (the 'combined' sewer). However in terms of future flood risk, better rainwater management through SuDS is the preferred approach to avoid problems associated with mixing surface water with wastewater and placing added pressure on drainage networks during heavy rainfall, helping to mitigate flood risk as well as 'combined storm overflow' (CSO) use. Unless or until Schedule 3 of the Flood and Water Management Act 2010 is enacted, we must accept new applications to connect surface water to the combined network as a last resort, in accordance with Building Regulations part H drainage hierarchy.</p> <p>DEFRA's recently published Storm Overflows Discharge Reduction Plan sets an expectation on water companies "to achieve year on year reductions in the amount of surface water that is connected to their combined sewer network [...] This should include limiting any new connections of surface water to the combined sewer network". Therefore, whilst Southern Water supports the intent of CCS6, we would also recommend a stronger requirement that minor as well as major development should include SuDS features, to avoid placing added pressure on the sewer network during wet weather.</p>	
18 D Orme	The planning system should prevent building on flood plains and should force all new driveways to be drain to soakaways or be permeable.	Comment noted – location of development and flood risk policy are matters for the local plan review.
19 New Forest East Constituency Labour Party	There is a need for developers to work closely with Southern Water to ensure the mains supply/sewage system is fit for purpose in the new development. eg the state and age of the pipes, the future capacity, leaks etc.	Developers have to formally engage with Southern Water on water supply and wastewater conveyance and treatment.
20 Bloor Homes Southern	Bloor Homes supports the use of SuDS and providing naturalised drainage mechanisms and these are incorporated into all of our schemes. All development proposals consider the potential for flood risk in line with	Comment noted.

	national guidance which sets out climate change allowances for flood risk. In this context sustainable drainage systems are designed to take into account extreme weather events, including an uplift for climate change.	
22 M Humber	Very good if it works but if not houses built on a stilt design with garages underneath.	Comment noted.
25 T Phillips	It is critical that any development can at the very least entirely mitigate the issues it creates in terms of flood risk. This ties into CCS7 and rainwater harvesting. In terms of flood prevention a rainwater tank capable of holding an entire heavy downpour should be mandated for all new developments and any significant planning permissions where it is practicable to add the tankage in at relatively little cost. This is SO important because it not only negates any flood risk (the tank can discharge over hours/days and has done its job mitigating flood if not harnessed up to be used by the dwelling) but also has a significant impact on mitigating Nitrate discharge as it is the flooding of sewerage that creates the most nitrate discharge from housing. The current tactic of looking to changes in farming to address the housing Nitrates issue is non-sensical at scale; housing must address housing derived nitrate discharge and farming must address farming related discharge. Holding potential floodwater back to prevent that volume of sewerage overflow is a direct saving and therefore tankage in every new development has the potential to sort this. Shallow dig 10,000L tanks are easily available and economical BUT only if done at the time of construction (new build or significant extension). This is where mandatory tankage is vital – retrofitting would require motivated homeowners or grants.	The SPD can only supplement adopted local plan policies. The suggested requirement is not currently within local or national policy and could only be achieved through the local plan review or change to national policy. However, the suggested requirement could form part of an approach to SUDS which would prevent flooding and reduce water consumption.
30 Stoford Developments Ltd	In respect of requirements 6. 'Flood risk reduction and sustainable urban drainage (SuDs)' and 7. 'Drought resilience and using water efficiently', we always seek to incorporate Sustainable drainage systems (SuDS) and other naturalised drainage mechanisms wherever they are capable of being effective. By way of example this has taken the form of attenuation basins, roadside swales, permeable paving and / or land drains. We also incorporate rainwater harvesting systems to provide water for flushing toilets and reduce water consumption. The other key aspect we consider on all our schemes is green infrastructure. On our larger multi-unit sites there is more opportunity to	Comment noted.

	create new wildlife habitats, such as wet land areas integrated into the SuDS systems, insect hibernacula, swift towers, and greater variety of species mix through new hedgerows and managed grassland planting.	
31 Persimmon Homes	These will obviously vary from site to site as ground conditions and options to dispose of the water will vary. We would hope that the LPA will take into account cost and the sometimes excessive land take which is required to provide such systems which may mean the housing numbers on the site may not be as envisaged or / and that greater density of development may be required in order to achieve an economic return.	Comment noted.
35 Ringwood Town Council	Commenting on SUDs design is outside our expertise area. Pointing to the latest NPPG sounds prudent.	Comment noted.
39 Fiddlesticks Farm	The site is outside of any area of flood risk and can positively address surface water drainage through a SuDS strategy, which has already been prepared and is factored into our concept layout. This will be of benefit both to the site and offsite downstream into the catchment below.	Comment noted – although a matter for the local plan review and out of scope for this SPD.
41 L Everitt	SUDS should be last resort.	The adopted local plan sets out that SUDs will be sought wherever they would be effective in reducing the risks of flooding (policy ENV3).
43 Natural England	<p>Regarding SuDS, it is important to note that these will form a mandatory requirement for most new development in England, under Schedule 3 to the Flood and Water Management Act 2010, expected in 2024. It is recommended the SPD reflects this. We agree that SuDS should be designed to CIRIA standards.</p> <p>It is noted CCS 6b part ii refers to nutrient reduction measures. Is this intended as a specific climate adaptation measure for development to address? We agree that the impacts of increased nutrients on habitats and species may be exacerbated by the effects of climate change and that SuDS can perform an important role in treating the quality of surface runoff water. Developments may be required to demonstrate nutrient neutrality to address impacts on protected sites where they are likely to have an effect without mitigation.</p> <p>We recommend that further measures for the natural environment are included within the SPD to help habitats and species (and ultimately the</p>	<p>Comment noted – SPD to be amended to remove the reference for SUDS only being required for major development.</p> <p>Comment noted – the SPD has been amended to refer to potential requirement for nutrient neutrality although guidance is liable to change and not repeated in SPD.</p> <p>The suggested additions would be more appropriate for inclusion in the forthcoming Biodiversity SPD and do not need to be</p>

111

	<p>human population that relies on healthy ecosystems) adapt to a warming climate, including maximised provision of habitat and/or contributions to local strategic conservation schemes, and sympathetic management of greenspaces that provides a variety of sward heights and habitat types and space for wildlife to find shelter/refuge, particularly during the growing season.</p>	<p>repeated in this document. The Local Nature Recovery Strategy may also be relevant.</p>
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Drought resilience and using water efficiently (CCS7)

Q9. What are your views on the proposed best practice objective to use mains and surface water more efficiently to improve drought resilience.

113

From	Comment	NFDC Response
07 Wings Wildlife Heritage	Every new property should be automatically fitted with a means of storing and re-use of 'grey water' for gardens, washing cars etc.	The SPD can only supplement adopted local plan policies. The suggested requirement is not currently within local or national policy and could only be achieved through the local plan review or change to national policy. However, the SPD flags grey water recycling as best practice.
10 Chapman Lilley Planning	Water consumption should be left to Building Regulations.	Comment noted. It is legitimate for planning policy to address water consumption. There is no requirement for standards more progressive than Building Regulations in the SPD although Target 100 is identified as best practice.
11 S Tonkin	Too much "could" and "should"; not enough "must".	Comment noted. The SPD can only supplement adopted local plan policies. Introducing new policy requirements currently beyond local or national policy can only be achieved through the local plan review or change to national policy.
12 B Lord	RWC and Grey Water re-cycling should be obligatory where ground is levelled for building replacement or in every new build large or small. Take the pressure off natural groundwater aquifers or riverine habitats at the earliest opportunity.	The SPD can only supplement adopted local plan policies. The suggested requirement is not currently within local or national policy and could only be achieved through the local plan review or change to national policy. However, the SPD flags rainwater harvesting and grey water recycling as best practice.
17 Southern Water	Whilst Southern Water would prefer to see higher water efficiency standards mandated in all new development (in line with our T100 program, mentioned in paragraph 113), we appreciate this goes beyond current legislative	Comment noted. However, it should be noted that 'reducing mains water demand' is an information requirement and the Council

	requirements. We are supportive of the measures set out in paragraphs 110-118, as well as the requirement for a reduction in mains water use in both major and minor new development (Table 1, page 16). These measures will contribute to sustainable development by helping to reduce demands on natural resources, and should help to reduce consumption to below the current legislative standard.	cannot compel developers to achieve standards beyond the higher Building Regulations standard.
19 New Forest East Constituency Labour Party	There is a need for developers to work closely with Southern Water to ensure the mains supply/sewage system is fit for purpose in the new development. eg the state and age of the pipes, the future capacity, leaks etc.	Developers have to formally engage with Southern Water on water supply and wastewater conveyance and treatment.
20 Bloor Homes Southern	Part G of the Building Regulations sets out water efficiency requirements for new dwellings, including standard and enhanced water consumption rates of 125 litres per person per day and 110 litres per person per day. Bloor Homes supports the delivery of water efficient homes, and all homes are built to the Government’s higher water efficiency standard of 110l/p/d and additionally, where feasible, all homes are provided with water butts to enable homeowners to make use of rainwater to water gardens. Furthermore as part of landscaping and planting in new developments we make use of climate tolerant species to minimise the impact of changing climate space, including reduced summer water availability on habitats and species. Any further targets for reducing water consumption should be set out in line with the Building Regulations.	Comment noted. It is legitimate for planning policy to address water consumption. There is no requirement for standards more progressive than Building Regulations in the SPD although Target 100 is identified as best practice.
22 M Humber	Policy is very good. However all water should be reused. Rainwater used for toilets and washing machines then the heat passing through a heat exchanger. No power showers and bath water recycled extracting the heat. All buildings to have water meters.	The SPD can only supplement adopted local plan policies. The suggested requirement is not currently within local or national policy and could only be achieved through the local plan review or change to national policy. However, the SPD flags rainwater harvesting and grey water recycling as best practice.
24 M Smith	Beef up the grey water usage requirements	The SPD can only supplement adopted local plan policies. More stringent grey water recycling requirements beyond current local or national policy and could only be achieved through the local plan review or change to

		national policy. However, the SPD flags grey water recycling as best practice.
25 T Phillips	<p>Rainwater harvesting needs to be mandatory and not optional at the point of grant of permission. Not only does it significantly reduce flood risk (see comments on CCS6) but can contribute heavily to water usage savings. The economics however are compelling at the time of construction (new build or significant extension etc) but often hard to justify as a retrofit for anyone but the most environmentally motivated. The combination of installing shallow dig rainwater harvesting tanks at the construction stage that can a) prevent flooding b) prevent nitrate discharge into waterways AND c) save water usage with all the benefits to preservation of resource and related biodiversity is both vital and economically very good value.</p> <p>One quick correction – paragraph 115 states that the annual water falling on a 60sqm roof would be 5,000 litres. I think it would be closer to 50,000 litres</p>	<p>Comment noted. The SPD can only supplement adopted local plan policies. More stringent rainwater harvesting and grey water recycling requirements beyond current local or national policy and could only be achieved through the local plan review or change to national policy. However, the SPD flags rainwater harvesting and grey water recycling as best practice.</p> <p>Agreed – SPD to be amended accordingly.</p>
26 Alex Lawton	<p>Does not go far enough, I think water butts should be used only as an alternative were larger rainwater harvesting tanks or grey water recycling are unsuitable. Water butts (unless several are joined together) do not provide sufficient water to last many(most?) gardens through the extended dry spells which are occurring more regularly.</p>	<p>The SPD can only supplement adopted local plan policies. More stringent rainwater harvesting and grey water recycling requirements beyond current local or national policy and could only be achieved through the local plan review or change to national policy. However, the SPD flags rainwater harvesting and grey water recycling as best practice.</p>
30 Stoford Developments Ltd	<p>We always seek to incorporate Sustainable drainage systems (SuDS) and other naturalised drainage systems wherever they are capable of being effective. This has taken the form of attenuation basins, roadside swales, permeable paving and / or land drains. We also incorporate rainwater harvesting systems to provide water for flushing toilets and reduce water consumption.</p> <p>The vast majority of our site is located outside of the Flood Zone with the exception of a swathe across the northern boundary which follows the route of the Cadnam River. We will plan to locate our buildings outside of the flood zone and incorporate SuDS as appropriate to avoid increased vulnerability to</p>	<p>Comment noted although not a matter for this SPD.</p>

	flooding. We will integrate green infrastructure and maximise the opportunities to increase biodiversity.	
31 Persimmon Homes	Where practicable and does not require significant cost implications, this may be achievable.	Comment noted.
33 New Milton TC	Does not go far enough. Water butts for grey water use with essential messaging about greatly diluted product use, would also be helpful to allow watering of vegetable gardens. This is essential for all dwellings as many attempt to save money/eat more cleanly rather than buying from supermarkets.	The SPD can only supplement adopted local plan policies. More stringent rainwater harvesting and grey water recycling requirements beyond current local or national policy and could only be achieved through the local plan review or change to national policy. However, the SPD flags rainwater harvesting and grey water recycling as best practice.
35 Ringwood Town Council	This area could be strengthened. Using drinking water for flushing toilets, albeit a reduced amount by limiting cistern size constraints, is frankly daft. The 110L standard is a blunt tool. Better would be greywater recycling and rainwater harvesting, as suggested, with underground tanks acting as mini-SUDs. The Crest-Nicholson site near Bicester has incorporated this technology and it was not cost prohibitive. Water bills (and therefore wastewater bills) are lower, although this is offset to a degree if the owner pays for the tanks to be cleaned periodically. It also reduces the phosphate load to the sewage system (drinking water is dosed with orthophosphoric acid). Fitting tanks under driveways works well. On sizing, we are unaware of any guidance on this, so a rainwater tank of 1 m3 per square metre of roof area minimum is suggested.	The SPD can only supplement adopted local plan policies. More stringent rainwater harvesting and grey water recycling requirements beyond current local or national policy and could only be achieved through the local plan review or change to national policy. However, the SPD flags rainwater harvesting and grey water recycling as best practice.
39 Fiddlesticks Farm	The scale of the Fiddlesticks Farm site, with up to around 140 dwellings and major open space, will enable economies of scale on materials, construction and land use, with greater potential to attain higher standards than the equivalent distributed over smaller sites.	Comment noted although not a matter for this SPD.
41 L Everitt	Every public building should collect enough water to flush its WC's. What level of mains water consumption should residents expect?	The SPD can only supplement adopted local plan policies. More stringent rainwater harvesting and grey water recycling requirements beyond current local or national policy and could only be achieved through the local plan review or change to national

		<p>policy. However, the SPD flags rainwater harvesting and grey water recycling as best practice.</p> <p>The baseline standard for residents is 110 litres per person per day, and lower usage is encouraged</p>
41 L Everitt	Further details are required as to water runoff from waterbutts and roofs.	Some additional detail is provided at para 115 (p.40).
42 P Stickley	<p>Let us look at just one of the services which are used by 99% or more households: water supply. In the last fifteen years, we have enjoyed a very reliable supply, with zero hosepipe bans in the summer periods, and the water has proved to be palatable and clear - apart from the occasional yellow tinge which appears about 48 hours after a downpour. We don't worry about such things. Mother Nature is at work. What really irritates me is that the threatened construction of around 250 houses in this vicinity looks as if it will have a wholly detrimental effect upon the water pressure in this area...and anyone who denies this is wholly in cloud cuckoo land, or very much better educated than me in the area of water pressure. So, to continue the thread of ideas (mine, and nothing very creative), why do we have to tolerate being treated to low to negligible water pressure, when the developers should be required to check and publicise the results of their investigations BEFORE a single brick is laid? Isn't this an obvious route to go, rather than make themselves very unpopular amongst the local existing population...to the point of hatred?</p> <p>Much of this trouble is fed by greed. The developers, not known for having a policy about how to look after the immediate surroundings of the site, want to get the first few houses built and sold, so that they can repay the bank from whom they have borrowed to undertake the development. Ignore everything and everyone, just do it, and we'll solve the problems with water pressure, poor drainage, negligible internet speed, negligible gas pressure, poor telephone lines, spaces in schools...and poor building quality possibly, at a later date.</p>	Comments noted. Developers and water companies have to work within the existing legislative and local and national policy context. The plan-led system is key to providing infrastructure to support new development.
43 Natural England	Southern Water's Water Resources Management Plan (WRMP) 2019, that covers the planning period 2020-2070, projects a significant supply demand	

	<p>deficit during periods of drought in the Western Area, and commits to implementing a long term water resources scheme to restore the supply demand balance whilst avoiding and/or mitigating impacts on protected sites. It is Natural England’s advice that in advance of any permitting of such a suitable long term scheme, uncertainty remains with regards to water resources and the impacts of abstraction on protected sites.</p> <p>CCS7 is about reducing mains water consumption. It is helpful that the SPD sets out water efficiency standards from the Buildings Regs and Southern Water. However we consider the SPD should go further in setting the standards as requirements. We recommend all new development within the Southern Water supply area adopt the higher standard of water efficiency of 100 litres/per person/day, in line with Southern Water’s Target 100 demand reduction programme. For other water supply areas we recommend water consumption for new dwellings of no more than 110 litres per person per day in line with the higher Building Regulations standard. Further water efficiency uses beyond this would be welcomed.</p> <p>We welcome the encouragement of rainwater harvesting and greywater recycling facilities in new development.</p>	<p>Comment noted. However, the SPD can only supplement adopted local plan policies. Introducing new policy requirements currently beyond local or national policy can only be achieved through the local plan review or change to national policy. Reduced water consumption is flagged as best practice.</p>
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Any other matters

Q10. Do you have any other comments on the Climate Change SPD? Specify the paragraph number(s) that you are commenting on wherever applicable.

119

From	About	Comment	NFDC Response
07 Wings Wildlife Heritage		Not enough attention is being paid to biodiversity enhancements. All developments (of any size) should have conditions included within the approval that certain enhancements that would benefit our declining birds and wildlife.	A separate biodiversity SPD is being prepared that will cover these types of issues.
10 Chapman Lilley Planning		<p>In summary, to reiterate, whilst the aims and objectives are laudable, the planning system neither has the resources or the legislation to enable the implementation of the SPD.</p> <p>If you are going to require a suite of reports and documents please make this expressly clear at the front of any document - so far I note the requirement for a CLIMATE CHANGE STATEMENT, a BRE ASSESSMENT, GOOD HOMES OVERHEATING RISK TOOL, CARBON EMISSIONS CALCULATIONS, BUILDING FOR A HEALTHY LIFE ASSESSMENT, RENEWABLE ENERGY CALCULATION, FUTURE PROOFING STATEMENT, SMART ENERGY SYSTEMS.</p>	<p>The best practice objectives identified in the SPD are sourced from independent industry experts. The SPD ‘best endeavours’ approach provides scope for applicants to explain what they can and cannot achieve, and to justify why other standards may represent best endeavours for a given development. The SPD will assist with the implementation of adopted local plan policies STR1 & ENV3. The proposed Climate Change Statement brings information generally already sought at planning applications stage (in other documents on the Local Information Requirements list) into one comprehensive document. In order to facilitate the provision of consistent information a proforma has been added to the SPD.</p>
11 S Tonkin	11, 16, 51 (and others):	11, 16, 51 (and others):	A separate Biodiversity SPD is being prepared and this would be the

		<p>Comments here and in the Separate Companion Document on reducing lighting in order to reduce energy use are welcome, as is the net zero carbon aspiration, but this lacks joined-up thinking and, therefore an open goal is being missed, i.e.mitigating climate change by preserving/enhancing the carbon sequestration provided by photosynthesisers. Given the growing evidence (links provided) of the harm caused to flora by artificial light at night (ALAN), measures to control ALAN would complement other measures to mitigate climate change.</p> <p>Incidentally, such measures would, of course, also have beneficial effects on biodiversity, in line with the "Nature" bit of the "Climate and Nature Emergency"></p> <p>Sample evidence for harm to flora caused by ALAN: https://besjournals.onlinelibrary.wiley.com/doi/full/10.1111/1365-2745.12551 https://www.nature.com/articles/d41586-018-00665-7 https://cescos.fau.edu/observatory/lightpol-Plants.html https://www.extension.purdue.edu/extmedia/fnr/fnr-faq-17.pdf https://www.researchgate.net</p>	<p>appropriate document to address this issue.</p>
<p>13 A Witt</p>	<p>Paras 119 & 120.</p>	<p>The document indicates in Figure 3 ecology and biodiversity requirements. I note that further guidance will be coming on this but there are also impacts on flood risk and overheating to consider which should be noted in this proposed regulation.</p> <p>For example, use of artificial grass and large paved/decked areas reduces the ability of properties to pass rainwater into the water table, creating runoff impacting other areas. Furthermore, such landscape treatments contribute to overheating. There is a win-win-win opportunity here by mandating planting regimes which require natural grass, water features, native tree cover, etc. As per current permitted development rules a requirement that non-natural features are limited to a proportion of the plot size would be appropriate. Maximising natural features provides habitats which can be further enhanced with wildlife corridors - e.g. use of natural hedges rather than fencing, provision of gaps in fencing - and also building features such as nest boxes and swift bricks etc.</p>	<p>Developers will be encouraged to address planting and landscaping in relation to climate change under CCS5a and hard landscaping under CCS6.</p> <p>A separate biodiversity SPD is being prepared that will cover these types of issues.</p>

15 L Tonkin	General	Net zero housing should have been required years ago, this SPD is too little too late.	Comment noted. The SPD encourages developers to make <i>best endeavours</i> towards achieving challenging best practice standards independently identified in the Net Zero Carbon Toolkit. In an SPD these cannot be set as mandatory targets, and these could only be achieved through the local plan review or a change in national policy.
19 New Forest East Constituency Labour Party		Does NFDC have any more ambitious plans for mitigating against Climate Change than the Government's targets? Is it possible to add some more tangible requirements to local plan policy ENV3?	This is a matter for the local plan review.
22 M Humber		Climate change is happening now. June 2023 was the hottest on record since 1940 and before. Be bold not cautious.	Comment noted.
26 Alex Lawton	Part B Table 1.	I am not sure that opt outs should be available for smaller developments. Most of the developments I have been aware of in the local area (waterside) are small and could therefore be built to lower standards. Many of these are above average size/price houses for which the additional costs of complying with best practice would be a small proportion of the total price.	The Council considers that it has struck an appropriate balance between asking developers to address climate considerations in new development without unduly burdening smaller developments.
26 Alex Lawton	Part C para120	(referring to Ecology and BNG Interim Advice Note P9-10). I think building enhancements should be provided wherever suitable (rather than at least one as in the guidance note). Hedgehog gaps in fencing, swift bricks, invertebrate bricks, bird boxes can all be provided at very low cost when constructing buildings. These will help improve habitat for animals in the built environment but may help residents to consider and appreciate these creatures more.	Comment noted. A separate biodiversity SPD is being prepared and this would be the appropriate document to address these issues.
27 Bargate Homes	57,61,(CCS1c,CCS2b):	Having consulted with Briary Energy, we understand that many of the standards within the SPD are established by LETI guidance. It is considered important that the SPD is clear in how it sets its EUI and space heating demand calculations.	

		<p>Building Regulations 2010 Approved Document L modelling (and its Standard Assessment Procedure (SAP)) is essentially the national compliance tool for calculating the energy performance of dwellings and underpins the Energy Performance Certificate (EPC) of new homes.</p> <p>Overall, many of the standards expected by the DRAFT SPD are a 10% improvement over Approved Document L, which is not – in and of itself – objected to. However, Part L is a nationally understood, easily auditable and accessible tool for driving better energy efficiency and renewables in housebuilding. Bargate Homes would therefore seek further clarity from the SPD as to which metrics (how) such exceedances of national energy efficiency standards are to be reported by developers and applicants in Climate Change Statements and other material.</p> <p>In addition, clarity is sought as to how (or by whom) such calculations shall be reviewed and assessed by the Council, as this is a technical exercise involving specialist knowledge and expertise.</p>	<p>Further guidance to be provided in a proforma</p> <p>The Council will work from the basis that calculations provided are correct and will review a sample of calculations. Planning officers will undergo appropriate training.</p>
<p>27 Bargate Homes</p>	<p>General</p>	<p>The SPD does not provide any ‘transitional arrangements’ upon adoption of the SPD, which raises concerns as to potentially difficult requirements needing to be met for planning applications which are already well advanced and policy compliant. It is requested that such arrangements are made within the SPD for applications which otherwise accord with the adopted development plan.</p> <p>The above is suggested, largely because of the approach to be taken in the adoption of optional or ‘additional’ (over and above national standards, which this DRAFT SPD endorses) standards. The Planning Practice Guidance acknowledges (para 12 6-012-20190315) that ‘local planning authorities can set energy performance standards for new housing or the adaptation of buildings to provide dwellings, that are higher than the building</p>	<p>It is intended that the SPD gives further explanation as the implementation of adopted local plan policies STR1 & ENV3. The SPD introduces the requirement for applicants to submit a climate change statement where the applicant can provide information to assist with the assessment of whether the proposed development complies with policies STR1 & ENV3. The SPD does not introduce new policy requirements which could only be achieved through the review of the local plan or change to national policy.</p>

	<p>regulations, but only up to the equivalent of Level 4 of the Code for Sustainable Homes.’ [Pegasus emphasis added].</p> <p>However, the PPG is also clear that this is allowed for by the Planning and Energy Act 2008, which itself ‘allows local planning authorities to set energy efficiency standards in their development plan policies that exceed the energy efficiency requirements of the building regulations’ (PPG para 012 6-012-20190315) [Pegasus emphasis added].</p> <p>GOV.UK advice also confirms that: ‘Supplementary planning documents (SPDs) should build upon and provide more detailed advice or guidance on policies in an adopted local plan. As they do not form part of the development plan, they cannot introduce new planning policies into the development plan.’ (PPG para 008 Reference ID: 61-008-20190315) [Pegasus emphasis added].</p> <p>As such, the introduction of new ‘standards’ via this SPD mustn’t be confused with the introduction of new policy, which can only be achieved via the adoption of Local Plans. The only policy compliant and sound approach the Council can take to the adoption of the optional technical standards is through a focussed review of the Local Plan. Only this approach would provide the necessary opportunity for the evidence to be thoroughly tested and scrutinised by stakeholders and a Planning Inspector.</p> <p>As such, it is considered that further nuance is required in the advocacy of standards within the SPD. The introduction of optional (and endorsed) standards over and above the Building Regulations to improve the sustainability of new development is noted by Bargate Homes. However, the SPD is currently drafted as to suggest that the standards being endorsed will be assessed in a ‘policy compliance’ way, against STR1 (vi) of the NFDC Local Plan 2016-2036 (Part 1). This does not accord with PPG or The Town</p>	
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		and Country Planning Regulations 2012, both of which confirm that SPDs and Local Development Documents are not local plans and cannot – in and of themselves – introduce new planning policy.	
29 Historic England	Additional section D on retrofitting	<p>Add a short, new section D in the SPD on retrofitting, supporting the role of heritage as part of the climate solution (as stated in Historic England’s climate strategy): summarising the challenges, emphasising the need for sensitivity and expert advice when retrofitting historic buildings taking a whole-building approach, and signposting other relevant guidance.</p> <p>Add a reference to policy DM1 on heritage and conservation in Appendix 1. Relevant HE guidance links provided in the HE representation</p>	The focus of the SPD is on new buildings and masterplanning new development. However, it would be helpful to signpost the Historic England guidance in the SPD and to clarify that the SPD only covers new buildings.
29 Historic England	Para 31	A ‘fabric first’ approach is not suitable for traditionally-constructed buildings.	Footnote added to this effect
29 Historic England	Paras 31 41, headings for Part C and subheadings preceding paras 67 and 72	Clarify that Figure 4 planning application requirements are for new development only, additional factors need to be considered when retrofitting traditionally constructed buildings. Amend headings to clarify guidance refers to new build development.	Agreed – clarification that guidance will refer to new build development will be added.
29 Historic England	56	Encourage the Council to recognise the important role of occupant behaviour on a building’s carbon emissions	Comment noted, but these are general principles for buildings from the NZCT.
31 Persimmon Homes	General	<p>In summary, to reiterate, whilst the aims and objectives are laudable, the planning system neither has the resources or the legislation to enable the full and realistic implementation of the SPD or to measure its ongoing effectiveness.</p> <p>If you the Council will require a suite of reports and documents, please make this expressly clear at the front of any guidance document – The SPD weaves numerous requirements in the text – effectively hidden – but so far we note the requirement for most planning applications for residential development will include; (1) CLIMATE CHANGE STATEMENT, (2) a BRE ASSESSMENT, (3) a GOOD HOMES OVERHEATING RISK TOOL, (4) CARBON</p>	The best practice objectives identified in the SPD are sourced from independent industry experts. The SPD ‘best endeavours’ approach provides scope for applicants to explain what they can and cannot achieve, and to justify why other standards may represent best endeavours for a given development. The SPD will assist with the

		<p>EMISSIONS CALCULATIONS, (5) BUILDING FOR A HEALTHY LIFE ASSESSMENT, (6) RENEWABLE ENERGY CALCULATION, (7) FUTURE PROOFING STATEMENT, and (8) a SMART ENERGY SYSTEMS.</p> <p>We cannot help conclude this is excessive and will not in any event be understood or meaningfully checked or assessed by the case officer, who with respect, is likely to be already overburdened with both workload and the ever increasingly complex nature of development management.</p> <p>The SPD is incredibly wordy and long. We would suggest / recommend, like several other LPAs have done, you try and make it simpler for applicants, by producing a simple check list and spread sheet which can be completed 'on line' and submitted with the application in order to speed up and pass validation process.</p>	<p>implementation of adopted local plan policies STR1 & ENV3.</p> <p>The proposed Climate Change Statement brings information generally already sought at planning applications stage (in other documents on the Local Information Requirements list) into one comprehensive document.</p> <p>The Council will work from the basis that calculations provided are correct and will review a sample of calculations. Planning officers will undergo appropriate training.</p> <p>The SPD references best practice examples which contributes to its length. In order to facilitate the provision of consistent information a proforma has been added to the SPD.</p>
33 New Milton TC		<p>Surprise that Manufactured Modular Construction is not mentioned, which uses no concrete, factories of which can produce one house per hour with construction taking one week per house e.g. current project in Ashford, Kent.</p>	<p>Part C of the SPD has been amended to include a reference to modern methods of construction in relation to embodied carbon.</p>
34 New Forest Friends of the Earth	Para 57	<p>MVHR is required if we go with well insulated homes.</p>	<p>The SPD cannot introduce a requirement for Mechanical Ventilation Heat Recovery but information as to whether it is proposed as part of the development is sought under CCS5c.</p>
35 Ringwood	General	<p>Implementation of this SPD will require a substantial training programme for Planning Officers, Members, etc. in order to embed an understanding of the issues and the SPD requirements.</p>	<p>Comment noted. It is intended that training will be provided.</p>

Town Council			
37 Hordle PC	69	The emphasis on form efficient design may compromise the character of the area and street scene.	Efficient form does not mean poor or inappropriate design. The SPD would not override relevant planning policy guidance on design and character, including Local Plan policies ENV3-4. Applicants will need to articulate any potential conflict in the Design and Access Statement and/or the Climate Change Statement.
42 P Stickleby	General	The most frustrating part of all this is that everyone KNOWS that it is entirely logical to lay the main services BEFORE building starts , and to ensure that adequate supplies or services are all at pressure and ready to start. We all KNOW that a building company wanting to build a huge number of domestic residences in a village will be the driving force behind many people objecting to the plans, and at the same time requiring more services IN the village - shops, a medical centre, a pharmacy, a larger or additional school, and so on. Everyone KNOWS that more recreational space will be needed, as will parking areas and spaces, and also places of worship. However, these things are never managed properly, and they get forgotten very easily, and then are squeezed into the blank spaces in the urban sprawl - not necessarily where they are needed, but anywhere they can be fitted. This must all sound and look very familiar to urban planners...but are the urban planners able to change the thinking which is required to make it happen? Apparently not. All too often good houses are demolished to make way for car parks; playing fields are used up by school expansion, and so on.	Comment noted – the plan-led system is key to providing infrastructure to support new development. These comments would be more appropriately addressed through the local plan review rather than this SPD.
43 Natural England	General	Nature-based solutions' (NBS) are an essential tool to achieve climate mitigation and adaptation. They involve the restoration of ecosystems for the long-term benefit of people and nature. Examples include expansion of tree and woodland cover; restoration and creation of priority habitats; natural floodplain	Text on nature-based solutions added and link to Natural England's report added.

		<p>management/ retrofitting of green infrastructure (GI) including sustainable urban drainage systems (SuDS). NBS can address multiple issues simultaneously, e.g. flood risk, air and water equality, biodiversity, and health and wellbeing of people.</p> <p>We welcome the final section of the SPD that focuses on supporting ecology and biodiversity, however we consider the SPD can be much stronger and more specific throughout, in requiring developers to design in nature-based solutions into their developments.</p>	
43 Natural England	General	<p>We would refer you to the Green Infrastructure Planning and Design Guide (Natural England, 2023). Chapter 5 Designing Green Infrastructure for Multiple Functions sets out the ways GI can help with climate change/resilience including ecosystem functions, biodiversity and pollination, soils, water, carbon and energy, temperature, and air quality as well as other functions such as health. In particular, section 5.6 Carbon and energy is particularly relevant to this SPD. With regard to habitat creation/restoration, it outlines “The restoration and creation of habitat results in the removal of carbon dioxide from the atmosphere and the sequestration of carbon in soil and woody vegetation. Wetlands, woodlands, tree plantings and permanent grasslands all store carbon. Re-wetting the landscape and creating sponge cities increases this. Habitat restoration and creation through the provision of green infrastructure, represent the most effective means of climate change mitigation, however it should be noted that it can take many years for habitats to mature, and it is important that sites continue to be managed appropriately”.</p>	<p>New Forest District Council benefits from a sub-regional Green Infrastructure Strategy produced by the Partnership for South Hampshire. Whilst it acknowledges the importance of green and blue infrastructure to mitigate and adapt to climate change, the Council considers that it does not need to expand on existing guidance in this SPD.</p>
43 Natural England	General	<p>To help with the development of climate change policy and action, Natural England has published a range of resources, including:</p> <ul style="list-style-type: none"> • The Climate Change Adaptation Manual - provides extensive information on climate change adaptation for the natural environment. It considers the potential impacts of climate change on individual priority habitats and outlines possible adaptation 	<p>Comments noted. SPD to be amended to include reference to the Carbon Storage and Sequestration by Habitat 2021 report.</p>

		<p>responses. It includes the Landscape Scale Adaptation Assessment Method to assist those wanting to undertake a climate change vulnerability assessment for an area larger than an individual site or specific environmental feature, focussing on identifying vulnerabilities to climate change.</p> <ul style="list-style-type: none"> • The National Biodiversity Climate Change Vulnerability Model is a mapping tool that helps identify areas likely to be more vulnerable to the impacts of climate change. • Carbon Storage and Sequestration by Habitat 2021 (NERR094) – a recently updated report that reviews and summarises the carbon storage and sequestration rates of different semi-natural habitats that can inform the design of nature-based solutions to achieve climate mitigation and adaptation. • The Nature Networks Evidence Handbook – aims to help the designers of nature networks by identifying the principles of network design and describing the evidence that underpins the desirable features of nature networks. It builds on the Making Space for Nature report (Lawton et al. 2010), outlining some of the practical aspects of implementing a nature network plan, as well as describing the tools that are available to help in decision making. • Natural England Climate Change webinars - a range of introductory climate change webinars available on YouTube. 	
44 Cranbourne Chase AONB	General	Our AONB Board has recently endorsed a Position Statement on Biodiversity and it expects all new development to follow that simple guidance whatever mechanisms government may eventually put in place.	Comment noted.
44 Cranbourne Chase AONB	General	As you know, CCAONB is also an International Dark Sky Reserve and we are concerned about light pollution, and combined effects with climate change. Our Dark Skies Advisor comments: Comments in the SPD and its Separate Companion Document on reducing lighting in order to reduce energy use are welcome, but there is a huge missed opportunity that is not addressed, viz mitigating climate change by preserving/enhancing the carbon sequestration provided by photosynthesisers. Given the growing evidence of the harm visited on flora by artificial light at night	A separate biodiversity SPD is being prepared and this would be the appropriate document to address this issue.

		(ALAN), measures to control ALAN would complement other measures to mitigate climate change. Such measures would, of course, also have beneficial effects on biodiversity.	
44 Cranbourne Chase AONB	General	Our Position Statements and Good Practice Notes can be found on our web site; Landscapes and Planning Publications - Cranborne Chase AONB do feel free to refer to them.	Comment noted.
37 Hordle PC	79	Concern about the noise heat pumps generate	AHSP noise levels must not exceed 42dB(A) at the boundary of an adjoining property (about the level of a refrigerator running).
29 Historic England	89	Add new para after 89: "When considering the deployment of on-site renewable generation, consideration needs to be given to local context, including the character of the area."	Suggested wording incorporated into the preceding para 88 Consider a general reference to design and character and the planning balance with other relevant policies e.g. by addition to para 7.
29 Historic England	90	NE recommend the inclusion of a sentence at the outset, by addition to para 90, that recognises the value of embodied carbon in the existing building stock: "As a result, there are significant carbon benefits from retaining existing buildings and adapting them where appropriate, rather than demolishing them for new build".	Agreed – SPD to be amended accordingly.
29 Historic England	Companion document pp 46, 47, 51, 59, 64	Recognising that the companion document is not the focus of the consultation and is largely extracted from an existing publication, NE suggest various succinct clarifications or amendments.	As the companion document was extracted from an existing publication it would not be appropriate to make amendments. The final version of the SPD will simply refer to the existing publication (the Net Zero Carbon Toolkit).

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Planning for Climate Change

Supplementary Planning Document (SPD)

Adopted April 2024

New Forest District (outside the National Park)



Acknowledgements

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A summary of the adaptations made from the original is available at [Change log for adaptation of the Net Zero Carbon Toolkit \(NZCT\)](#).

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Contents

Acknowledgements	2
Part A: Introduction.....	4
Purpose, objectives and structure	5
Climate and Nature Emergency	6
Policy context.....	7
Benefits and costs of net zero carbon development	9
Part B: Requirements for Planning applications	12
Summary	13
Planning application Climate Change Statements.....	19
Part C: Climate Change mitigation and adaptation.....	26
About this section.....	27
Net Zero carbon buildings: core principles and definitions.....	28
Key Performance Indicators (KPIs)	29
A recipe for achieving net zero carbon development.....	32
Getting the design right `	33
Future proofing heating technology	34
Designing out overheating risks	35
On-site renewable energy generation	36
Embodied carbon.....	37
Facilitating sustainable transport.....	39
Reducing flood risk through Sustainable Urban Drainage Systems (SuDS)	39
Drought resilience and using water efficiently	40
Supporting ecology, biodiversity and nature-based solutions	42
Appendices	43
Appendix 1: Local Plan 2020 - climate change related policies	44
Appendix 2: Climate Change Statement Information Proforma	45
See the Net Zero Carbon Toolkit for further information and guidance.....	45
Appendix 3: Good Homes Alliance early stage overheating risk tool	49
Appendix 4 Case studies for new build	50
Appendix 5: What to do when? Checklist for design and construction.....	51





Part A: Introduction

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Purpose, objectives and structure

1. The purpose of the Planning for Climate Change Supplementary Planning Document (SPD) is to provide guidance for the planning policies contained in the [Local Plan Part One 2016-2036: Planning Strategy \(2020\) \(hereafter 'Local Plan'\)](#). The SPD clarifies how developers should address climate change in planning applications, in order to meet Local Plan requirements, in particular for the two policies in the inset box below (other climate change related policies are listed in Appendix 1).

Policy STR1: Achieving sustainable development

All new development will be expected to make a positive social, economic and environmental contribution to community and business life in the Plan Area by: ...

- vi. Ensuring that new development is adaptable to the future needs of occupiers and future-proofed for climate change and innovations in transport and communications technology.

Policy ENV3: Design quality and local distinctiveness

... New development will be required to: ...

- v. Incorporate design measures that improve resource efficiency and climate change resilience and reduce environmental impacts wherever they are appropriate and capable of being effective...

2. It does so by setting out best practice approaches or standards that developers are encouraged to target or to adopt, to
 - take all practicable steps to decarbonise the running of buildings;
 - to meaningfully reduce embodied carbon in construction; and
 - to ensure development is climate change adapted.
3. The aim is to ensure that designs are climate change optimised before planning applications are submitted for determination by New Forest District Council (hereafter 'the Council'). It should be noted that the focus of this SPD is on new buildings and masterplanning new development rather than retrofitting existing buildings. The Council's Greener Housing Strategy refers to retrofitting in the existing housing stock and Historic England provides advice on retrofitting historic buildings in its [Climate Strategy](#). There is extensive detailed advice on retrofitting in the **Net Zero Carbon Toolkit**¹.
4. Whilst it is essential to make meaningful carbon savings now, it will not always be possible to achieve best practice standards for reducing carbon emissions in one step. Where it is not yet feasible for a building to be zero carbon in operation, an important second objective of this SPD is for all such development to be **zero carbon ready**, capable of running without carbon emissions.
5. To be 'zero carbon ready' requires that any additional steps needed to achieve zero carbon running are identified and enabled at design and build stage, when it is most cost efficient to do so. This will help to minimise the carbon impact, cost and inconvenience of future upgrading.

¹ [The Net Zero Carbon Toolkit](#)



SPD structure

6. **Part A** (pages 5-12) briefly sets out the implications of climate change locally, defines key terms and provides the international and national policy context. It also summarises the costs and benefits to developers and occupiers of achieving zero carbon development
7. **Part B** (pages 13-26) sets out the information required to accompany planning applications in the form of a Climate Change Statement.
8. Drawing on the Net Zero Carbon Toolkit and supporting Part B, **Part C** (pages 27-43) provides best practice guidance for climate change mitigation and carbon reductions in the design of new development, in particular for new housing. It also provides guidance on climate change adaptation. Where there is potential conflict between the need to respect local distinctiveness or heritage issues in design terms, and the need to address climate change through design, the preferred approach and its justification should be articulated in the design and access statement and the climate change statement. The National Model Design Code recognises the environmental performance of place and buildings to ensure they contribute to net zero targets as part of the baseline standard of quality and practice.
9. The appendices (from page 44) provide further supporting information.

Climate and Nature Emergency

10. On 11 October 2021 New Forest District Council declared a Climate and Nature Emergency and continues to tackle the local climate emergency². This SPD is part of the wider set of actions by the Council to deliver on the Declaration, outlined in a **Climate and Nature Emergency Action Plan**³ (updated regularly).
11. This SPD complements the Council's **Greener Housing Strategy**⁴ which focuses on decarbonising the Council's own affordable house building programme and affordable housing stock. The Strategy also commits the Council to working with private owners and landlords to help decarbonise existing private homes.

CO₂e, zero carbon and climate change effects

12. Climate change is widely accepted to be caused by increased greenhouse gases in the atmosphere. The term CO₂e is the common unit of measurement to indicate the impact of all greenhouse gases, not just carbon dioxide. Two broad types of response to climate change are required, defined⁵ as follows:
 - **Climate change mitigation:** Action to reduce the impact of human activity on the climate system, primarily through reducing greenhouse gas emissions.
 - **Climate change adaptation:** Adjustments made to natural or human systems in response to the actual or anticipated impacts of climate change, to mitigate harm or exploit beneficial opportunities.

Carbon emissions from development

13. Energy is consumed and carbon is emitted at all stages of the whole-life cycle of a development.

² [Climate change - New Forest District Council](#)

³ [NFDC Climate Change and Nature Emergency Report and Action Plan 2023](#)

⁴ [NFDC Greener Housing Strategy 2022 to 2032](#)

⁵ Source: NPPF glossary



14. **Embodied carbon** is emitted from energy consumed during construction, including the production and transportation of building materials - processes developers have some ability to control or influence. Thereafter embodied carbon also arises from periodic maintenance and ultimately from building demolition and waste disposal processes (net of any carbon savings from materials that can be recycled and any energy that can be recovered from residual waste).
15. **Operational carbon** is emitted over time from the energy consumed during the occupation and use of the building, in two categories:
 - **Regulated emissions** from energy used to run the building, including lighting, heating, cooling/ventilation and hot water - so known because energy efficiency and carbon standards in these areas are controlled by the Building Regulations.
 - **Unregulated emissions** are the remaining emissions from user behaviour, the other appliances and devices occupiers choose to fit or plug in.

Policy context

International

16. In 2018, the Intergovernmental Panel on Climate Change (IPCC) showed the world there would be only 12 years (to 2030) to prevent irreversible catastrophic damage from a changing climate. Any temperature increase greater than 1.5°C above pre-industrial levels would trigger far worse effects than previously thought, in terms of drought, flood, poverty for many people, and catastrophic biodiversity loss.



Figure 1: IPCC and UN climate change documents front covers

National legislation

17. The **Climate Change Act** 2008 (as amended 2019) legally commits the UK government to achieving net zero carbon emissions by 2050. In 2021 the UK Climate Change Committee’s Sixth Carbon Budget⁶ committed to a ‘world leading’ 78% reduction carbon target by 2035, relative to 1990 levels.
18. The **Environment Act** 2021 requires the Secretary of State to introduce legally binding environmental targets on a range of matters including air quality, resource efficiency and waste reduction, published in December 2022⁷.

⁶ Sixth Carbon Budget: <https://www.theccc.org.uk/publication/sixth-carbon-budget/>

⁷ [Environmental targets consultation summary of responses and government response \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/104444/environmental-targets-consultation-summary-of-responses-and-government-response.pdf)



National planning policy and guidance

19. The **National Planning Policy Framework** (NPPF 2023) sets out that the overarching environmental objectives of the planning system include ‘using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy’.
20. The NPPF para 157 states that:
 ‘The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure’.
21. The NPPF para 159 states that:
 ... ‘new development should be planned for in ways that: (a) avoid increased vulnerability to the range of impacts arising from climate change... (b) can help to reduce greenhouse gas emissions, such as through its location, orientation and design...’
22. The National Planning Practice Guidance section on [Flood risk and coastal change](#) was significantly updated in August 2022. The NPPF and NPPG now comprehensively address how developments should avoid, or if necessary mitigate or adapt to, all forms of flood risk, including predicted climate change effects.
23. The [National Design Guide](#) (MHCLG 2021) outlines and illustrates the Government’s priorities for well-designed places. It states that well-designed places and buildings conserve natural and other resources including buildings, land, water, energy and materials. Their design responds to the impacts of climate change by being energy efficient and minimising carbon emissions to meet net zero targets⁸.

NFDC Local Plan Part One 2016-2036: Planning Strategy (2020)

24. As part of the preparation of the adopted Local Plan, current and future flood risks were assessed in detail. Safe development locations with access to opportunities, facilities and services were prioritised for development in the Local Plan to help reduce the need to travel (to the extent practicable in a predominantly rural area). Local Plan policies that address climate change matters are summarised in paragraph 1 and appendix 1.

Cranbourne Chase AONB Management Plan

25. The adopted Cranbourne Chase Area of Outstanding Natural Beauty (AONB) Management Plan has climate change as a central theme running through it and contains aims and objectives for the conservation and enhancement of the National Landscape. It contains specific guidance on landscape and rural issues applicable to development in the designated National Landscape.

Building Regulation

26. The Building Regulations regulate the ‘operational’ energy used to run buildings and the carbon emissions arising (Approved Document L: Conservation of fuel and power,

⁸ [National Model Design Code, Part 2: Guidance notes](#), ‘Resources’ section.



as updated 2022). The following Approved Documents are also relevant to how buildings adapt to or mitigate climate change.

- Approved Document F: Ventilation
- Approved Document O: Overheating
- Approved Document S: Infrastructure for the charging of electric vehicles.

27. In 2019-2021 the government consulted on a **Future Homes Standard** and **Future Buildings Standard**, proposals to amend the Building Regulations in 2025. The proposals would reduce regulated operational carbon emissions by 75 and 80% compared with 2019 standards, including banning fossil fuel boilers in new homes from 2025.

Benefits and costs of net zero carbon development

28. There is a cost to achieving net zero as a society. For some sectors it will require technological innovation and investments in research and development. New buildings are comparatively less challenging in terms of net zero in operation. Technologies, techniques and processes required to run buildings without adding to carbon emissions are already available.
29. Lowering the embodied carbon of constructing new buildings will be more challenging and requires both material and procurement innovations. However, this does not have to lead to a significant cost premium either.

Buildings produce a lot of carbon – and are expensive to run

30. It is clear that a Net Zero UK will require a significant reduction in energy use and carbon emissions from all buildings and, in particular, homes. Even today, most new homes are being fitted with gas boilers and these will continue to emit carbon and also to degrade local air quality during their operational life.

Britain has not made sufficient progress on this

31. Despite rapid decarbonisation in many other sectors, the energy efficiency of new homes has remained almost constant over the last ten years. The rate of improvement stalled following the withdrawal of the Zero Carbon Homes target in 2016.
32. Interim improvements to the Building Regulations from 2022 will help (Part L 2021), but there is a need to do much better than the ‘business as usual’ practice of minimum regulatory compliance in the construction sector.

Heating: an important energy demand which can be reduced

33. Space and water heating accounts for more than half of the total energy demand in a new home, and space heating is estimated to account for 65% of home winter energy use⁹. Space heating demand is an excellent proxy for the thermal efficiency of the building fabric, which is why it is important to concentrate on a ‘fabric first’ approach in most circumstances¹⁰.

⁹ <https://energysavingtrust.org.uk/energy-at-home/heating-your-home/>, Net Zero carbon Toolkit

¹⁰ A ‘fabric first’ approach may not be suitable when retrofitting buildings of heritage value or of traditional construction.



A 2% - 6% cost premium for net zero carbon in operation

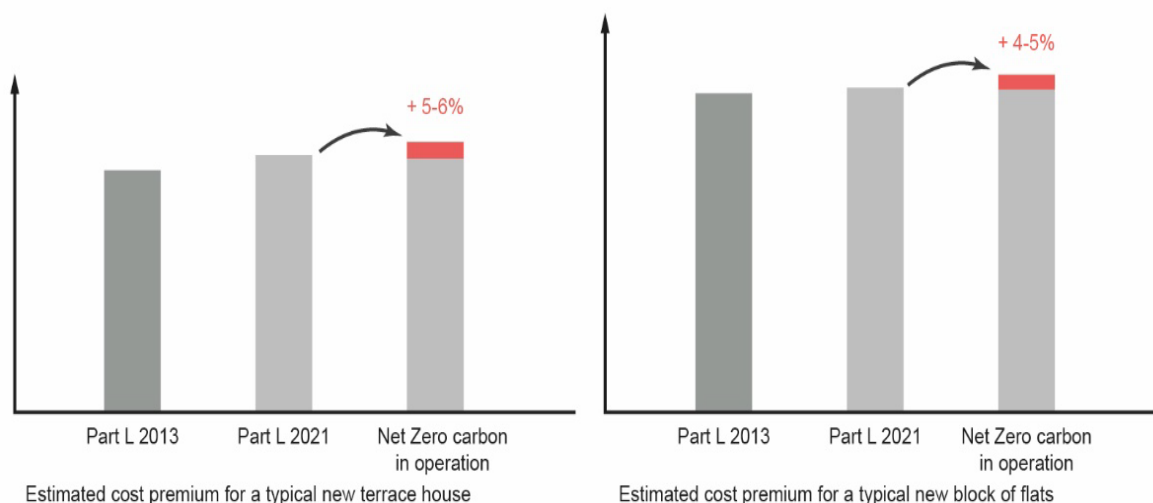


Figure 2: Estimated cost premium for typical new homes (Source: NZCT)

34. The dwelling construction cost premium for delivering a new net zero carbon home has been estimated to be approximately 2% to 6% above a Part L 2021 compliant equivalent¹¹. It will be a smaller percentage of final house sales prices, which would additionally reflect the cost of land and any other facilities, community benefits or infrastructure provided.

Potential to drive down net zero costs

35. A significant advantage in committing to net zero new homes is that it is a sustainable standard for the future. It offers significant opportunities for developers, clients and contractors to reduce their additional costs over time by improving processes (e.g., airtightness) or contributing to driving down the cost of key technologies. Whilst inflation is currently high overall the general trend has been a significant reduction in the cost of solar photovoltaic (PVs) in the last ten years. Other reductions, albeit smaller, are expected for heat pumps and Mechanical Ventilation Heat Recover (MVHR) systems.

UK homebuyers are prepared to pay a green premium

36. Slightly higher build costs will not necessarily affect development viability. Allowance should be made for cost recovery from buyers prepared to pay more for a home in return for lower energy bills. A recent survey¹² of 2,300 buyers, agents and mortgage brokers found that buyers are already prepared to pay a 9.4% premium for previously owned homes that have been energy efficiency retrofitted, and 15.5% more for a home that meets high energy efficiency standards.

Significant cost savings for the residents

37. Net zero carbon homes are significantly cheaper to run than a standard new build house. This is due to the combined effects of lower energy demand alongside greater flexibility of energy use during the day, and home use of solar electricity where PV is installed.

¹¹ Recent evidence produced for Winchester and Cornwall Councils support this estimate. [Technical evidence based for Policy SEC1 – new housing](#) (Etude, Currie & Brown, July 2021). [Net Zero Carbon Targets, Evidence Base for Winchester City Council](#) (Elementa, Etude, Currie & Brown, Sept 2022).

¹² [Buying into the Green Homes Revolution](#), October 2022, Santander.



Avoided costs for retrofitting and to society as a whole

38. Continuing to construct buildings that use fossil-fuel dependent space and water heating systems is likely to be financially misguided in most cases. Designing a home for a heat pump-based system from the outset is estimated to cost around one-fifth of the cost of retrofitting that technology to the same quality and standard¹³.
39. There are also wider off-site benefits of 'getting it right now' in terms of reduced energy infrastructure costs as less renewable energy generation will be required to achieve a decarbonised national grid.
40. Within a generation a fossil-fuel dependent heating system will need to be replaced, and there is no guarantee that similar replacements will still be legal and available. Future retrofitting will also generate further embodied carbon emissions in the refurbishment process, especially if the original design was not future proofed for this eventuality.
41. Even in the unlikely event that there is no realistic alternative to a gas or oil boiler at the time of construction, future replacement costs can and should be avoided by designing and specifying the building to simplify a future air source heat pump retrofit for both space and water heating.

¹³ [UK housing: Fit for the future?](#), Climate Change Committee 2019, p14 See for example [Buyers of brand-new homes face £20,000 bill to make them greener](#), Guardian 23 Jan 2021. Analysis cited used Climate Change Committee data.





Part B: Requirements for Planning applications

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Summary

42. Figure 3¹⁴ illustrates the recommended measures to achieve climate adapted development. Whilst the example shown is a new build residential dwelling the principles apply equally to other forms of new build development.

It is recommended that new homes are built to zero carbon standards using the standards and performance metrics defined by LETI (<https://www.leti.london>)

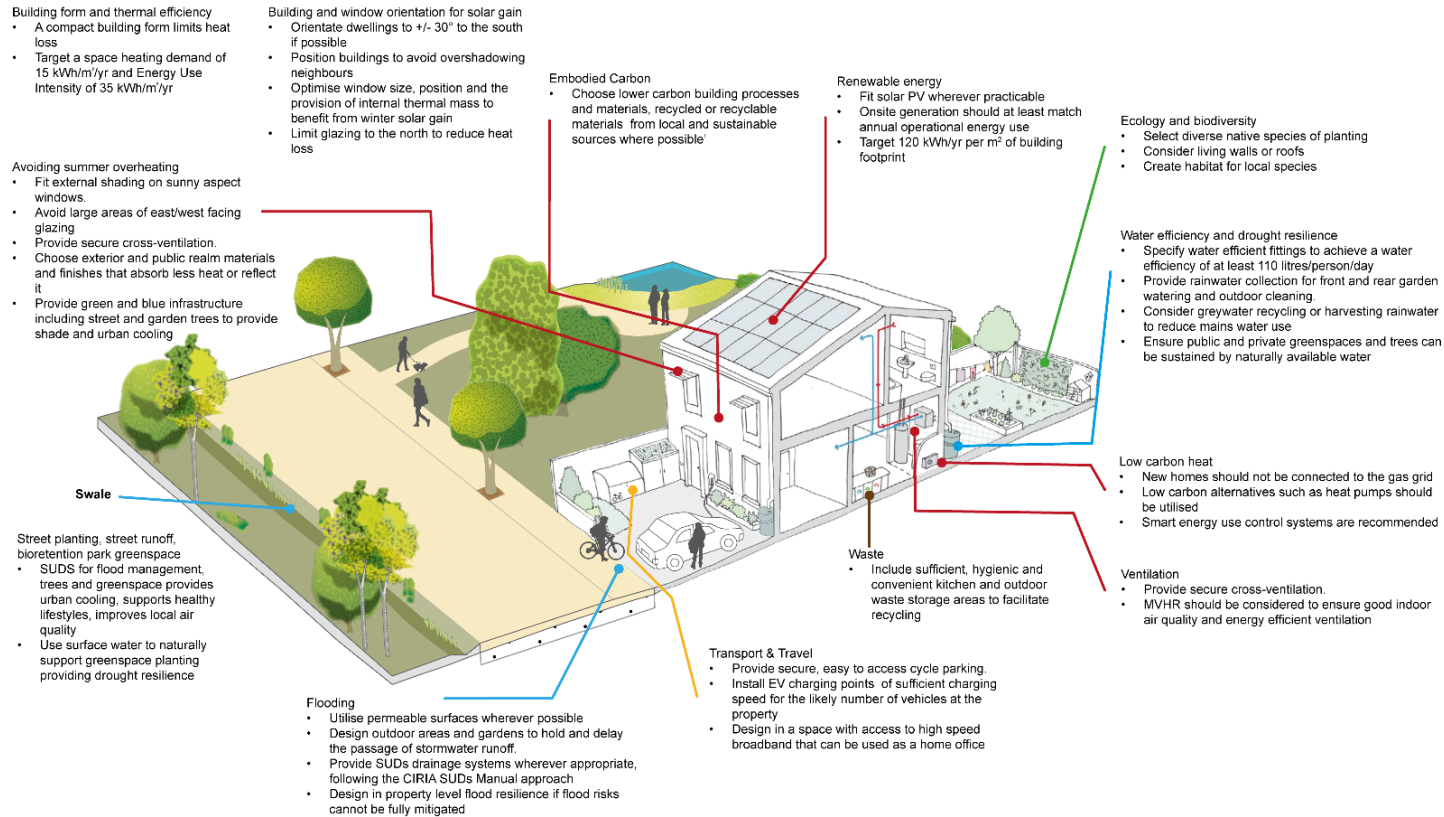


Figure 3: Recommended measures to achieve climate adapted development

¹⁴ Image copyright, re-used and adapted with the permission of Cheltenham Borough Council; Etude; April Grisdale Illustrations



43. This section outlines the information to be provided with planning applications for new buildings, as summarised in Figure 4, and set out in more detail later in the section. It will not be applicable for applications for changes of use, retrofitting existing buildings or householder applications. Planning permission, listed building consent and building regulations approval may be required for retrofitting, depending on the nature of the building and proposed works. Table 1 overleaf sets out information requirements by planning application stage and type. Figures 5-6 set out recommended technical building standards for houses and flats. For other development uses see section C.

Climate change mitigation

1. Minimising energy demand targeting net zero carbon in operation: To set out how energy demand in the use and occupation of the development has been minimised to actively target net zero carbon in operation. To state whether or not the developer is making a **Future Homes and Buildings Now** commitment to only installing a low carbon heating system, otherwise to explain the reasons why not and how the lowest carbon heat source practicable has been specified. To provide calculations for space heating and total operational energy demand (Energy Use Intensity) and the resulting CO₂e emissions.

A secondary objective where a zero carbon in operation cannot be achieved and/or low carbon heating is impracticable, is to ensure that the development is future-proofed to be zero carbon ready without requiring significant retrofitting.

2. On-site renewable energy generation: To generate on-site renewable energy wherever possible, providing a calculation of the renewable energy generated.

3. Reducing embodied carbon emissions: To set out the steps taken to reduce carbon emissions from (embodied in) the construction process up to the point of practical completion. For major developments, to calculate the reductions achieved.

4. Sustainable travel: To address certain property level measures to support sustainable travel, including application of the Building for a Healthy Life design approach on residential developments of 50 or more homes (other aspects to be assessed from other transport information required at planning application stage).

Climate change adaptation

5. Avoiding overheating: Residential developments to undertake a Good Homes Alliance early stage overheating risk assessment. All major developments to describe how heatwave mitigation has informed planting, green infrastructure and landscaping proposals.

6. Flood risk reduction and sustainable urban drainage: To provide permeable hardstanding surfaces and SuDS wherever appropriate, SuDS to be designed in accordance with the Construction Industry Research and Information Association (CIRIA) SuDS Manual approach. Where applicable, to explain how the drainage system minimises nutrient run off, and how the development will mitigate residual flood risks in extreme flood events (NB emphasis on surface water management. Other aspects to be assessed from flood risks assessments, where they are required at planning application stage).

7. Drought resilience and using water efficiently: to install water butts, and to summarise other measures proposed to reduce the need for mains water use and to make best use of surface water runoff.

Figure 4: Summary of planning application information requirements



Table 1: Climate Change Statement (CCS) information requirements by planning application stage and type

		Minor development		Major development			Notes
		1-9 homes	Other < 1,000sqm	10-49 homes	50+ homes	Other ≥ 1,000sqm	
Climate change mitigation and zero carbon							
1. Minimising operational energy demand targeting net zero carbon in operation							
1a	Minimising energy demand by design	Y	Y	Y	Y	Y	All development
1b	Low carbon heating systems	Y	Y	Y	Y	Y	Future Homes & Buildings commitment
1c	Energy use and carbon calculations	Y	Y	Y	Y	Y	For detailed design approval stage
1d	Smart energy systems	Y	N	Y	Y	N	Residential development
1e	Future proofing statement	Y	N	Y	Y	N	Relevant residential developments
1f	Heat pump pre-installation option	N	N	Y	Y	N	If heat pumps are not already included
2. On-site renewable energy generation							
2a	Onsite renewable energy	Y	Y	Y	Y	Y	Wherever feasible
2b	Renewable energy calculation	Y	Y	Y	Y	Y	For detailed design approval stage
2c	Option to purchase PV pre-installation	N	N	Y	Y	N	If PV is not already included
3. Reducing embodied carbon emissions							
3a	Reducing embodied carbon	Y	Y	Y	Y	Y	All development
3b	Calculating embodied carbon savings	N	N	N	Y	Y	Larger major developments
4. Sustainable travel (assessment will mainly use other planning application supporting information)							
4a	Cycle parking and EV charging	Y	Y	Y	Y	Y	All development
4b	Design to Building for a Healthy Life	N	N	N	Y	N	Larger residential developments

Continued overleaf

145



Minor development		Major development			Notes
1-9 homes	Other < 1,000sqm	10-49 homes	50+ homes	Other ≥ 1,000sqm	

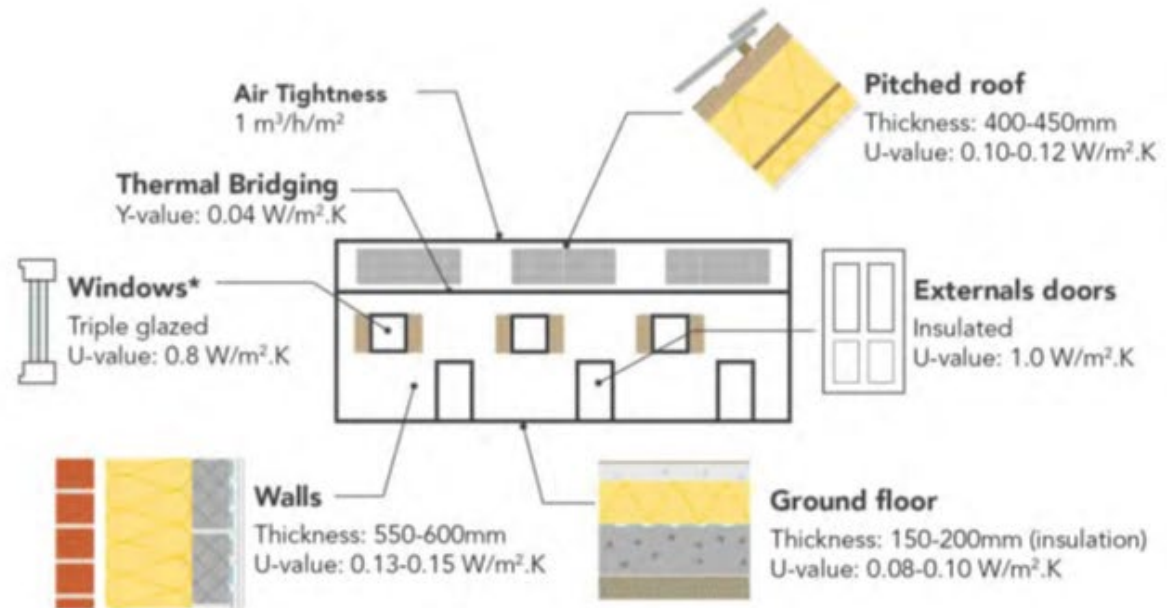
Climate change adaptation							
5. Avoiding overheating							
5a	Natural heatwave mitigation	N	N	Y	Y	Y	All major development
5b	GHA Overheating risk assessment	Y	Y	Y	Y	Y	All residential developments
5c	Use of MVHR	Y	Y	Y	Y	Y	All developments
6. Flood risk reduction and sustainable urban drainage (SuDS) (assessment will mainly use other planning)							
6a	Managing surface water runoff	Y	Y	Y	Y	Y	All developments
6b	SuDS	Y	Y	Y	Y	Y	Wherever SuDS are appropriate
6c	Flood resilience measures	Y	Y	Y	Y	Y	Wherever residual flood risks remain
7. Drought resilience and using water efficiently							
7	Reducing mains water demand	Y	Y	Y	Y	Y	All developments

146



Design checklist

- Form efficiency**
Ensure the building form is as simple and compact as possible
- Window proportion**
Follow recommended ratio of window to external wall
- Mechanical ventilation**
MVHR 90% efficiency
≤2m duct length from unit to external all
- Airtightness**
Airtight building fabric
< 1 m³/h/m² at 50 Pa
- Heating system**
Choose a low carbon heating system e.g. heat pump
- Design out overheating**
Carry out overheating analysis (as per CIBSE TM59 guidance) and reduce overheating through design e.g. external shading, openable windows and cross ventilation



Performance

As electricity generated on site with PVs is the same as the Energy Use Intensity (EUI) on an annual basis, the building is **Net Zero carbon in operation.**

- Typical terrace house built to building regulations
- New zero carbon terrace house



Figure 5: How zero carbon comes together – new terraced housing



Form efficiency
 Ensure the building form is as simple and compact as possible

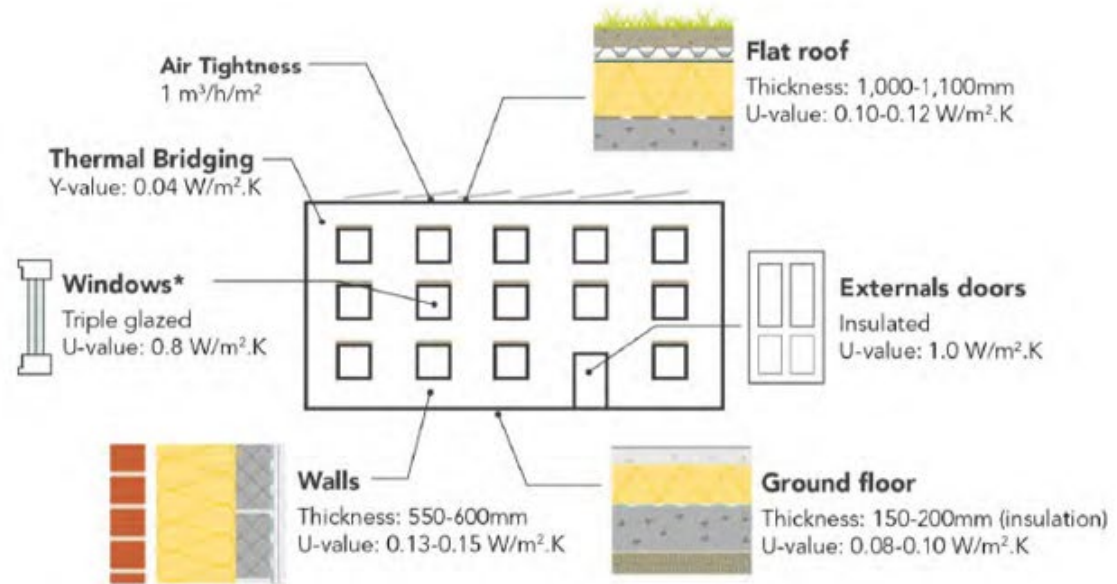
Window proportion
 Follow recommended ratio of window to external wall

Mechanical ventilation
 MVHR 90% efficiency
 ≤2m duct length from unit to external all

Airtightness
 Airtight building fabric
 < 1 m³/h/m² at 50 Pa

Heating system
 Choose a low carbon heating system e.g. heat pump

Design out overheating
 Carry out overheating analysis (CIBSE TM59) and reduce overheating through design e.g. external shading, openable windows and cross ventilation



Performance

As electricity generated on site with PVs is the same as the Energy Use Intensity (EUI) on an annual basis, the building is **Net Zero carbon in operation.**

- Typical terrace house built to building regulations
- New zero carbon terrace house



Figure 6: How zero carbon comes together – a block of flats



Planning application Climate Change Statements

Introduction

44. Planning applications should be supported by sufficient information to demonstrate how the proposed development will meet Local Plan requirements in relation to climate change (set out in paragraph 2 and Appendix 1). This evidence will be submitted in a **Climate Change Statement**¹⁵ (CCS) that addresses all the best practice objectives and information requirements set out in this section, unless they are clearly not relevant to the development type or location.
45. CCS sections 1-4 address climate change mitigation and will also demonstrate how the proposed development will play its part in achieving net zero carbon by 2050, and a 78% reduction on 1990 levels by 2035. Further information is provided in Part C of this SPD. Sections 5-7 address climate change adaptation.
46. In order to simplify the process for applicants and to ensure that the Council receives consistent information, a proforma is included at Appendix 2. This should be sufficient to enable consideration of adopted Local Plan policies STR1 and ENV3 for most applications. However, applicants for larger scale development, particularly residential development above 50 dwellings, may wish to add to the information in the proforma to provide further justification for their approach to design and layout in relation to climate change.
47. Applicants will need to provide sufficient information in their CCS to enable an assessment as to whether the proposed development meets the requirements of adopted Local Plan policies STR1 and ENV3. However, developers cannot be compelled, through this SPD, to meet the best practice standards. Applicants are encouraged to engage in preapplication discussions with the Council as early as possible in the design process, particularly for larger developments.

Best practice and best endeavours

48. The Council recognises that some of the best practice standards are challenging, as they should be. The scale and urgency of the climate challenge means that 'business as usual' is not an acceptable option. It is a Local Plan requirement that meaningful steps are taken now, which means demonstrably improving on the carbon and energy efficiency performance and climate resilience of mainstream building practices.
49. The developers' CCS information will evidence the steps that will be taken to achieve best practice where possible. Developers also need to ensure that their designs are capable of meeting the Future Homes and Future Buildings standards. Where it is not possible to achieve best practice, the CCS should set out the options the developer has considered and tested. It should explain why the approach proposed represents best endeavours that reduce CO₂e emissions, energy demand and climate changes risks to the fullest extent practicable, and how future retrofitting costs have been minimised.

¹⁵ The CCS is proposed to be added to the [Local Information Requirements](#) list, a process that will be undertaken and consulted on separately. Doing so would bring together in one place, and replace, equivalent information requirements already on the list in other documents e.g., the Renewable and Low Carbon Statement.



50. The information provided allows the developer to articulate their case as to how the proposed development ensures the ‘risks to people, places and the environment from climate change effects are minimised’. Also, how they have incorporated design measures that improve resource efficiency and climate change resilience and reduce environmental impacts wherever they are appropriate and capable of being effective. However, it is unlikely that planning permission will be refused on the basis that a target or standard will not been met. A policy to require this level of intervention would need to be part of the formal Local Plan Review process.

Proportionate information

51. A reduced level of detail is acceptable for planning applications that are not ‘major applications’ i.e., less than 10 homes or less than 1,000 sqm (GIA) of other floorspace (both figures gross rather than net of any existing floorspace).
52. Where multiple buildings are proposed, data can be provided for a sample representative of the different types of buildings and their positioning and solar orientation on the site. The sample will be agreed in the planning application process.
53. Where the relevant design details are not known e.g., for outline planning applications, it may be appropriate to agree the details at reserved matters application stage. If during the life of an application material amendments are made the CCS may need to be updated.

Avoiding unnecessary duplication of information

54. Depending on the type, scale and location of the development a range of supporting information or technical studies must be submitted when a planning application is made. In addition, the Local Plan requires that non-residential development of 1,000 sqm Gross Internal Area (GIA) or more should attain Building Research Establishment Environmental Assessment Method (BREEAM) ‘Excellent’ standard overall (Policy IMPL2). This is a process which culminates in an assessment report issued by BREEAM. The development of commercial development of between 250-999 sqm GIA should attain excellent standard for water consumption.
55. This supporting information may provide a range of climate change related information. Where applicable and provided that the relevant matters are covered, it will be acceptable to address the information requirements of this SPD by submitting a CCS providing a summary response plus a cross reference to the parts of the submitted technical documents or assessments that cover the issue in more detail (provided that they are submitted at the point of making the planning application).
56. The same approach can be taken where the developer is using an independent benchmarking process for the quality, sustainability, carbon reduction or energy efficiency of the development, for example Passivhaus or BRE Home Quality Mark.

Climate Change Statement (CCS) contents

CCS 1. Minimising energy demand and targeting net zero carbon in operation **Best practice objectives:**

The development process should actively target **net zero carbon in operation**, minimising by design the energy needed for heating, lighting, ventilation and cooling, opting wherever practicable for a heat pump or other efficient low carbon heating system. Passive design measures should be considered first to make effective seasonal use of solar gain and natural ventilation and cooling.



Specifications for new build fabric efficiency for residential development should target achieving a space heating demand under 15 kWh/m²GIA/year, and total operational energy demand (Energy Use Intensity) of under 35 kWh/m²GIA/year. Best practice benchmarks for re-purposing buildings for residential use, or other types of development should be agreed at pre-application advice stage, starting with the LETI / Net Zero Carbon Toolkit (see SPD Section C, 'Key Performance Indicators'). The inclusion of 'smart' energy use and heating control and monitoring systems that can also measure onsite renewable energy generation and use is recommended.

Secondary objectives:

Where net zero carbon in operation cannot be achieved currently, buildings should aim to be **zero carbon ready**¹⁶.

If a heat pump or other efficient low carbon heating system is demonstrably not practicable, or net zero carbon readiness cannot reasonably be achieved, the building should be **future proofed**: designed to reduce energy demand and CO₂e emissions as far as is currently practicable, and to minimise the cost and disruption of retrofitting the building to run efficiently with a heat pump system in the future.

For further information see SPD Part C sections [Getting the design right](#) (pages 32-33) and [Future proofing heating technology](#) (pages 33-34). The construction methods, airtightness, ventilation, heat pump and smart controls sections of the Net Zero Carbon Toolkit may also be helpful.

[CCS 1a: Minimising energy demand by design \(all development\):](#)

Explain how the design brief, performance specification and commissioning process for the development has (or will) actively seek to minimise energy demand in use, in particular for space and water heating.

[CCS 1b: Low carbon heating systems \(all development\):](#)

(i) State whether or not the developer is making a **Future Homes and Buildings Now** commitment to the installation of a low carbon, energy efficient heating system, and if not, to explain why it is not possible to do so.

(ii) At the point of planning application for approval of the detailed design, confirm the heating system specified for the development. If a heat pump-based or alternative low carbon heating system is not specified, detail the lower carbon options that have been considered and explain why they are not feasible¹⁷.

[CCS 1c: Energy use and carbon calculations \(all qualifying development\):](#)

At the point of planning application for approval of the detailed design, provide calculations of the space heating demand, total operational energy demand (EUI), CO₂e emissions per sqm GIA per annum for the building designs proposed¹⁸, and the total operational carbon emissions in tonnes per annum for the development as a whole. If the results exceed the recommended best practice targets, provide an

¹⁶ Meaning net zero carbon in operation will be achieved when national electricity supply is fully decarbonised.

¹⁷ This assessment may draw on information required to be provided in accordance with the Building Regulations, regulation 25A: Consideration of high efficiency alternative systems, but the information is required at the point of planning application. Compliance with regulation 25A may not be sufficient to achieve compliance with planning policy requirements.

¹⁸ Where there are multiple building types a representative sample will be agreed.



evidenced justification that the best practicable outcome has been achieved for the location, type and form of development.

For developments of 10 or more dwellings or 1,000 sqm or more of other¹⁹ floorspace, energy use and CO₂e calculations should use an industry recognised method such as the [Passivhaus Planning Package](#) (PHPP) or CIBSE [TM54 Evaluating operational energy use at the design stage](#) (2022). For developments below these thresholds the same approach is recommended, but calculations based on the Target Primary Energy Rate required for Building Regulations (Part L) purposes will also be acceptable.

[CCS 1d: Smart energy systems \(all development\):](#)

Confirm whether or not smart energy use and heating control and monitoring systems will be fitted, and whether the system will be capable of measuring onsite renewable energy generation and use. If not, explain why it is not possible to do so.

[CCS 1e: Future proofing statement \(any residential development unable to commit to a low carbon heating system\):](#)

At the point of planning application for approval of the detailed design, provide a statement setting out all the works required to install a heat pump system in the future, including any associated building fabric or other upgrading necessary to ensure occupier comfort in winter. The future proofing statement is to be made available to all prospective buyers.

[CCS 1f: Option to purchase heat pump pre-installation \(relevant residential developments of 10 or more homes\):](#)

If heat pump installation is demonstrated by appropriate evidence to be unfeasible on the grounds of financial viability, buyers purchasing off-plan should be given the opportunity to purchase from the developer a heat pump system pre-installation at a discounted supplementary cost.

CCS 2. On-site renewable energy generation

Best practice objectives:

On-site renewable energy generation should be provided wherever it is practicable to do so. Wherever possible this should be sufficient to at least meet annual operational energy use of the development to achieve net zero carbon development in operation. Targeting on-site renewable energy generation of at least 120 kWh/year per square metre of building footprint is also recommended for residential development.

For further information see SPD Part C section: [On-site renewable energy generation](#) (page 35). The Solar PV sections of the Net Zero Carbon Toolkit may also be helpful.

[CCS 2a: Onsite renewable energy \(all developments\)](#)

Set out the development approach to optimising the generation of onsite renewable energy. If no onsite renewable energy provision is proposed explain why it is not possible to do so.

[CCS 2b: Renewable energy generation calculation \(all development providing onsite renewable energy generation\):](#)

¹⁹ Information that already has to be provided in accordance with Building Regulations Part L(2), para 94



At the point of planning application for approval of the detailed design, provide a calculation of the renewable energy that will be generated on-site, in total²⁰ and per sq.m of building development footprint. Express this value as a percentage of the best practice target of 120 kWh/m²/year, and as a percentage of the building operational energy use (EUI) calculated for CCS 1c.

If the onsite renewable energy generated is below the predicted annual regulated operational energy use, provide a justification that the best practicable outcome has been achieved for the development proposed.

[CCS 2c: Option to purchase PV pre-installation \(all residential developments of 10 or more homes where effective PV installation is feasible\):](#)

Where PV installation on a residential development is possible but demonstrated by appropriate evidence to be unfeasible on the grounds of financial viability, every new home buyer purchasing off-plan a dwelling with a roof suitable for PV should be given the opportunity to purchase from the developer the pre-installation of a PV system at a discounted supplementary cost.

CCS 3. Reducing embodied carbon emissions

Best practice objectives:

As an interim step towards the full decarbonisation of construction by 2050, developers should take all practicable steps to meaningfully reduce embodied carbon emissions from construction materials and processes up to the point of practical completion.

If a [UK Net Zero Carbon Buildings Standard](#) is published this objective will be updated.

For further information see SPD Part C section: [Embodied carbon](#) (pages 36-37).

[CCSC 3a: Reducing embodied carbon \(all development\):](#)

Identify and describe any steps that have been or will be taken to reduce carbon emissions from the construction process up to the point of practical completion.

[CCSC 3b: Calculating embodied carbon reductions \(developments of 50 or more homes or more than 1,000 sqm GIA other uses\):](#)

Provide a calculation of the carbon emissions saved by these steps using a recognised methodology, expressed in tons CO₂e and as a percentage of the total embodied carbon in the development that would have otherwise been generated up to the point of practical completion.

CCS 4. Sustainable travel

Best practice objectives:

To minimise the need to travel, and to optimise opportunities to travel when needed by active and public transport modes, or by electric vehicle.

For further information see SPD Part C section: [Facilitating sustainable transport](#) (page 38).

Note: Sustainable travel implications will primarily be assessed from information in one or more of the following documents where they are required to be provided when a planning application is submitted: the [Design and Access Statement](#), [Transport Assessment](#), [Travel Plan](#) for the site.

²⁰ Where there are multiple building types a representative sample will be agreed.



[CCS 4a: Cycle parking and EV charging \(all development\):](#)

At property level provide secure and accessible cycle parking and EV charging capacity sufficient for the number of occupants/users likely to be present.

[CCS 4b: Building for a Healthy Life \(residential development 50+ homes\):](#)

Development proposals should be assessed using the [Building for a Healthy Life](#) design approach, and should seek to achieve a green light score for all assessment considerations. Applicants are encouraged to engage in pre-application discussions with the Council on the design and layout of the development at an early stage so that the Building for a Healthy Life approach can positively influence the form of development,

CCS 5. Avoiding overheating

Best practice objectives:

To enable building and general urban cooling in peak summer and heatwave conditions by good design, including planting strategies, green and blue infrastructure provision and hard landscaping. To design out avoidable summer overheating risks to avoid the need to install air conditioning within buildings.

For further information see SPD Part C section: [Designing out overheating risks](#) (pages 34-35).

Note: Where relevant, CCS responses may briefly summarise and cross refer to information in one or more of the following documents, where they are required to be provided when a planning application is submitted: [Biodiversity Survey and Report](#), [Design and Access Statement](#), [Sustainability Statement](#), [Tree Survey /Arboricultural Statement](#), [Ventilation/Extraction Statement](#).

[CCS 5a: Natural heatwave mitigation \(all major development\)](#)

Describe how heatwave mitigation has informed the planting and landscaping strategy, including any green and blue infrastructure provision, and the choice of building materials and surfaces including hard landscaping.

[CCS 5b: Overheating \(all residential development\)](#)

For residential development complete and submit the [Good Homes Alliance early stage overheating risk tool](#) assessment prior to finalising the detailed design of the development (see Appendix 2). The total overheating risk score should be 'low' in the design submitted for planning approval. If a low score cannot be achieved, explain why and set out how the residual overheating risks will be mitigated. Parts of the tool will also be useful for non-residential development.

[CCS 5c: MVHR \(all development\)](#)

Confirm whether or not Mechanical Ventilation Heat Recovery (MVHR) will be provided.

CCS 6. Flood risk reduction and sustainable drainage systems (SuDS)

CCS 7. Drought resilience and using water efficiently

Surface water management and drought resilience should be considered together.

Best practice objectives:



To naturally and safely manage and dissipate surface water run off under climatic extremes. To incorporate SuDS and other naturalised drainage mechanisms wherever they are capable of being effective, designed to minimise runoff discharge to sewers and to maximise amenity, biodiversity and water quality co-benefits. To exceed Building Regulations requirements for water consumption efficiency. To ensure that private gardens, public realm planting, greenspaces and water features are drought and climate resilient and can be sustained without using mains water.

For further information see SPD Part C sections: [Reducing flood risk through Sustainable Urban Drainage \(SuDS\)](#) (pages 38-39), and [Drought resilience and using water efficiently](#) (pages 39-40).

[CCS 6a: Managing surface water runoff \(all developments\)](#)

Identify measures included or proposed to naturally dissipate, hold or slow the movement of surface water in both public and private areas. Identify any hardstanding and paved surfaces that would not be water permeable and explain why a permeable or partly permeable surface is not practicable.

[CCS 6b: SuDS \(all developments unless SuDS are not appropriate\)](#)

- i. Demonstrate how SuDS have been designed and specified as an integral part of the site design process in accordance with the best practice approach set out in the CIRIA SuDS [Manual](#) (C753). Identify any proposed piped or other runoff discharge to sewers and explain why a surface-based drainage approach discharging to a watercourse was not possible e.g., with a revised development layout.
- ii. Explain how measures to minimise nutrient runoff have been incorporated into the SuDS design. There may be a requirement to demonstrate development is nutrient neutral although requirements are liable to change and not repeated in this document.

[CCS 6c: Flood resilience measures \(any development where its flood risk assessment identifies residual flood risks, including residual risks identified when applying the appropriate Environment Agency climate change allowance²¹\).](#)

Briefly summarise and provide a cross reference to the section of the development Flood Risk Assessment that addresses proposed flood prevention and flood resilience measures. Demonstrate that any such measures are specified in accordance with CIRIA [Designing for exceedance in urban drainage - good practice](#) (C635F) and the CIRIA [Code of practice for property flood resilience](#) (C790A).

[CCS 7a: Reducing mains water use \(all developments\)](#)

- i. Confirm the water use efficiency standard the development will be specified to achieve.
- ii. Commit to installing and define the location on submitted plans for the installation of appropriately sized water butts as standard in all gardens or yard spaces where a gutter downpipe can be provided.
- iii. Describe any other measures proposed, or at detailed design stage specified, to reduce the need for mains water use by making best use of rainfall or surface water runoff in public or private realms.

²¹ [Flood risk assessments: climate change allowances - GOV.UK \(www.gov.uk\)](#)





Part C: Climate Change mitigation and adaptation

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About this section

57. This section is derived from the Net Zero Carbon Toolkit (NZCT), updated for NFDC circumstances and with additional information added on aspects of climate change adaptation. This toolkit was created to make net zero carbon building more accessible. Although it can be used by homeowners, it is aimed at those who already have some knowledge or experience of construction.

58. The main focus is on new housing, but the principles apply equally to other uses. Supporting information is provided in the appendices.



Figure 7: Toolkit breakdown

From site selection to construction to operation

59. The toolkit, including the appendices, covers all stages of building design and construction, including maintenance and operation.

Understanding the complete picture

60. The toolkit, including SPD appendices, aims to build the awareness and confidence of people implementing low or zero carbon projects and generally seeks to answer the following questions:

- Why do this?
- What does “good” look like?
- What to do when and how to bring it all together?
- What to specify and some product options.



Net Zero carbon buildings: core principles and definitions

Operational net zero carbon

61. The three core principles of buildings that are net zero in operation are energy efficiency, low carbon heat and the use of renewable energy. Buildings should also minimise carbon emissions from materials production and construction processes to be fully net zero.

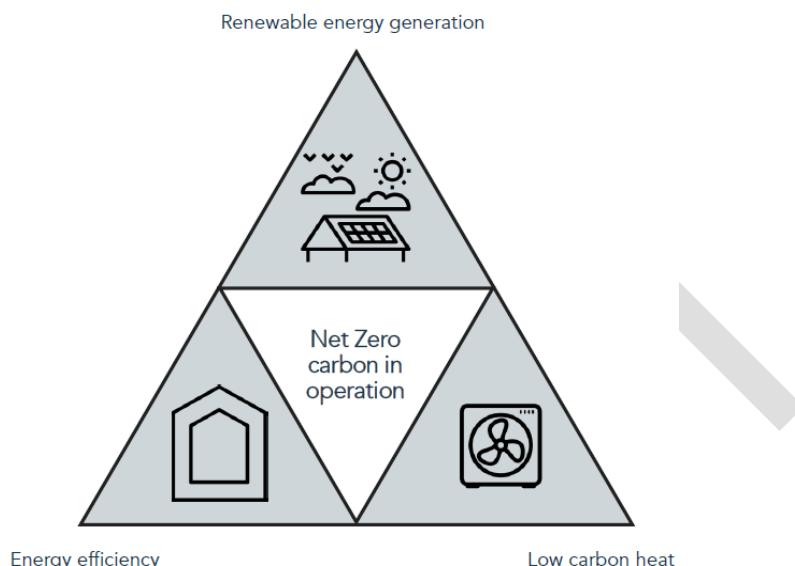


Figure 8: The three pillars of a net zero carbon building in operation

Energy efficiency

62. Buildings use energy for heating, hot water, ventilation, lighting, cooking and appliances. The efficient use of energy reduces running costs and carbon emissions. Importantly, it also reduces a building’s impact on the wider energy supply network. There are two key metrics used in this toolkit to measure the energy efficiency of a building, both expressed in kWh/m²/yr.

- **Energy Use Intensity (EUI)** is the annual total energy consumed running and occupying a building divided by its floor area. It is the sum of regulated energy (for heating, hot water, cooling, ventilation, and lighting systems – so called as it is covered by the Building Regulations) and unregulated energy (use for plug in devices that is outside of the scope Building Regulations).
- **Space heating demand** is the energy required to heat the building, usually the largest component of regulated energy.

Low carbon heating

63. An essential feature of net zero carbon buildings is the use of low carbon sources of heat with no connection to the gas network.

Renewable energy generation

64. In new buildings, renewable energy generation should be at least equal to the annual energy use of the building for it to qualify as net zero carbon in operation. This is straightforward to achieve on site for most new homes by installing solar photovoltaic (PV) panels, which will also help to support the increased demand for renewable energy.



Key Performance Indicators (KPIs)

What energy use targets should I aim for?

65. Energy use targets are more transparent and robust than carbon reductions targets for ensuring zero carbon is delivered in practice. The Net Zero Toolkit recommends targets consistent with the [LETI Climate Emergency Design Guide](#) (2019).

Housing

66. Best practice KPIs for new homes are set out in figure 9. All KPIs except the embodied carbon target must be met for a home to be Net Zero carbon in operation and to achieve an ultra-low energy home with very low space heating demand. Space Heating Demand is an excellent proxy for the fabric efficiency of the building - 15 kWh/m²/year is exemplary, requiring a fabric efficiency and airtightness equivalent to that of a new Passivhaus home.



Figure 9: Housing KPIs

KPIs for other uses

67. Non-residential building types tend to vary more widely than housing, making it more difficult to reliably determine generic forms, energy use or occupancy models. However, as noted in the Net Zero Carbon toolkit the Royal Institute of British Architects (RIBA), Low Energy Transformation Initiative (LETI), the United Kingdom Green Building Council (UKGBC) and other organisations have published relevant guidance on performance



targets for space heating demand, total energy use and renewable generation, summarised in Net Zero Carbon Toolkit as follows.

Schools

- Space heating demand of 15-20 kWh/m² GIA/year
- Total energy consumption of 65 kWh/m² GIA/year or less
- Solar electricity generation that exceeds metered energy use on site

Hotels

- Space heating and cooling demand of less than 30 kWh/m² GIA/year
- Total energy consumption of 55 kWh/m² GIA/year or less
- Solar electricity generation at least 120 kWh/m² GIA/year

Offices

- Space heating and cooling demand of less than 15 kWh/m² GIA/year
- Total energy consumption of 55 kWh/m²/year or less
- Solar electricity generation at least 120 kWh/m² GIA/year

Light Industrial

- Space heating and cooling demand of 15-30 kWh/m² GIA/year
- Total energy consumption of around 55 kWh/m² GIA/year excluding specialist processes
- Solar electricity generation of least 180 kWh/m² GIA/year.

68. Note that the Local Plan requires that ‘major’ non-residential development of 1,000sqm GIA or more should attain [Building Research Establishment \(BREEAM\) New Construction](#) ‘Excellent’ standard. Development of 250-999 sqm GIA should attain excellent standard for water consumption. The primary aim of BRE assessment is to mitigate the life cycle impacts of new buildings on the environment in a robust and cost-effective manner. In relation to zero carbon the BRE approach takes a ‘whole life cycle’ approach to construction impacts, encouraging measures to improve the energy efficiency of the building and to reduce carbon emissions. But as BRE New Construction does not set specific energy targets the energy efficiency benchmarks above are recommended as well.

69. Note that for non-residential development of 1,000sqm ‘useable floorspace’ energy use reporting is already a Building Regulations²² requirement. In meeting this requirement an industry recognised energy forecasting methodology such as Chartered Institution of Building Services Engineers (CIBSE) [TM54 Evaluating operational energy use at the design stage](#) should be used.

Why set a renewable energy target?

70. Net zero carbon in operation can only be achieved by meeting the energy needs of the development using renewable electricity generation provided for the development. A significant proportion of mains electricity is currently generated from fossil fuels.

Reducing the embodied carbon of a building

71. To go beyond net zero in operation towards net zero for the whole building lifecycle, embodied carbon must be significantly reduced and any residual carbon can be offset, for example by tree planting. This can be achieved by making informed design decisions

²² Para 94 Building Regulations Part L(2).



about materials based on quantified carbon reductions. It may be possible to significantly reduce embodied carbon by using modern methods of construction. Unlike traditional building methods, manufacturing buildings off-site can enable the use of lower carbon materials such as timber in place of concrete and steel.

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A recipe for achieving net zero carbon development

Setting the right brief and targets is key

72. To achieve net zero carbon in reality it is important that the development design brief and its Key Performance Indicators (KPIs) reflect this ambition from the start. Getting the right people involved at the right points in the design and construction timeline is critical, including specialists in low energy and zero carbon design. The key steps up to building handover are set out below, showing a timeline for design and construction. See Appendix 4 for a more detailed breakdown by RIBA design and construction stage.

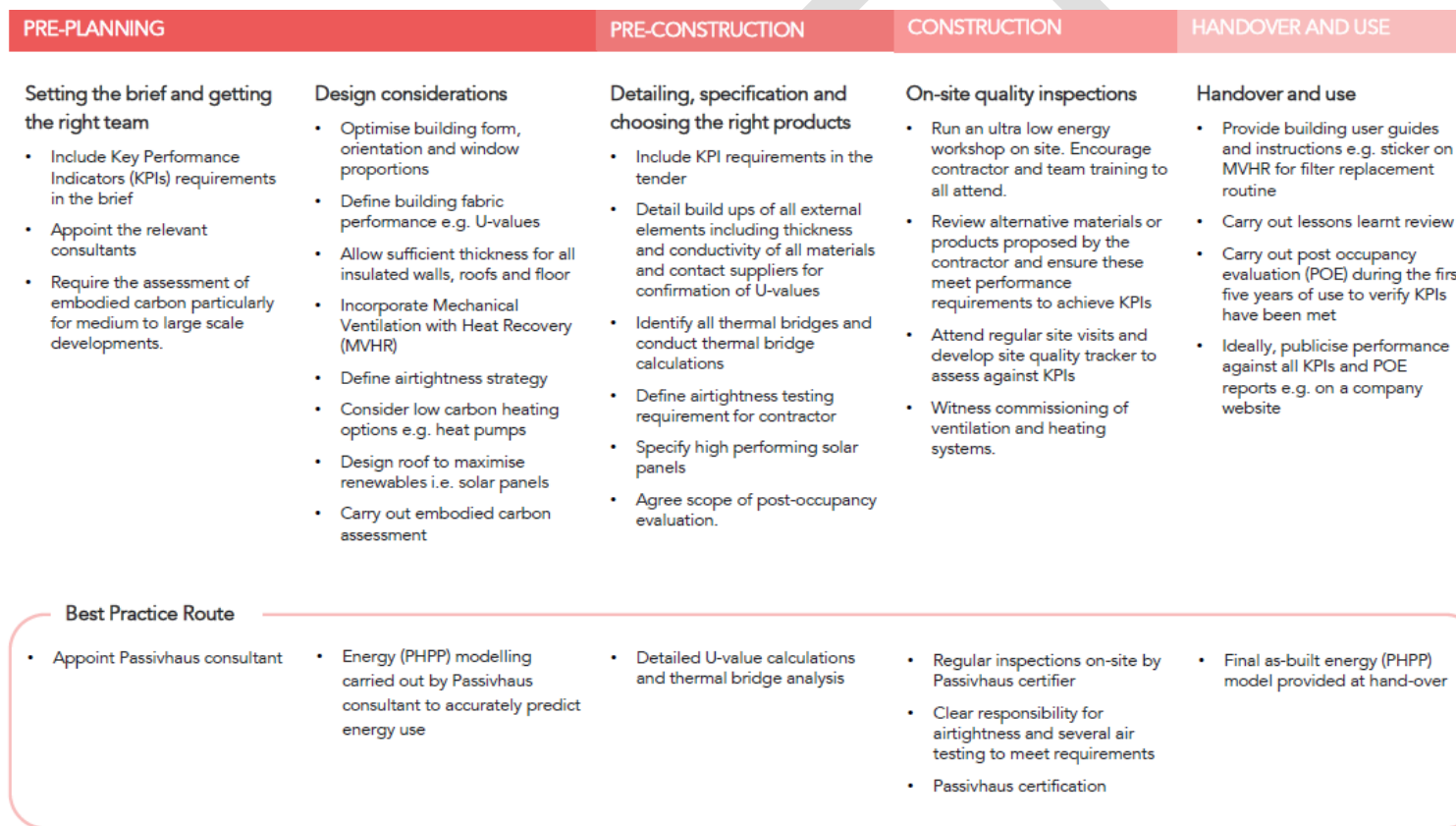


Figure 10: Timeline for design and construction

162



Getting the design right`

73. Making informed decisions at an early design stage is key to delivering energy efficiency in practice. A building’s form, orientation and window proportions are all aspects that do not add extra construction cost, but if optimised within the design can significantly improve the building’s efficiency (see figure 11).

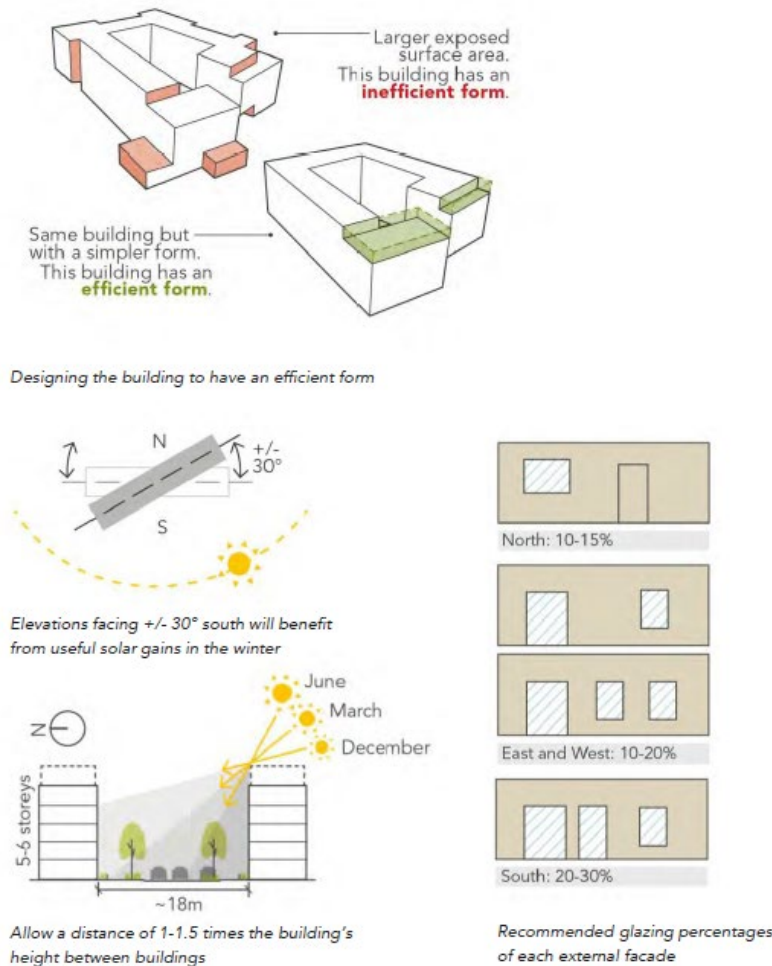


Figure 11: Optimising design (Source: Levitt Bernstein + Etude)

Building form and orientation

74. The building form should be as simple and compact as possible to reduce the surface area exposed for heat loss. Avoid or limit the use of stepped roofs, roof terraces, overhangs and inset balconies. These features will decrease the building’s energy efficiency.

75. The orientation and massing of the building should be optimised to allow useful solar gains and prevent significant overshadowing in winter. Encourage south facing dwellings with summer solar shading and prioritise dual aspect.

Window proportions and thermal performance

76. Getting the right glazing-to-wall ratio on each façade is a key feature of energy efficient design. Minimise heat loss to the north (smaller windows) while providing sufficient solar heat gain from the south (larger windows). In a block of flats it is much easier to design smaller windows facing access decks and larger windows facing balconies. Therefore, try to orientate access decks to the north and balconies to the south.



Fabric first approach

77. Specifying a high level of thermal efficiency and airtightness of the building fabric, and for the thermal performance of elements such as doors and windows is critical to reducing energy demand. The [LETI Climate Emergency Design Guide](#) provides best practice thermal specifications for building elements cited in this SPD. It is equally important that high standards are maintained in the construction process²³ to deliver the full thermal efficiency potential of the materials used.

Consider Passivhaus tools and certification

78. Passivhaus certification is considered a robust means to meet the space heating demand and Energy Use Intensity KPIs. It also drives quality assurance during construction. A Passivhaus ‘certifier’ will be required to act as an impartial quality assurance check on predicted performance during design and to carry out site inspections. Appendix 3 provides some recent examples of Passivhaus developments. For housing the [Passivhaus Design Easi Guide](#) provides further good practice advice.
79. Whether or not the Passivhaus approach is adopted, accurate energy modelling is recommended. Passivhaus tools can be used whether or not Passivhaus accreditation is sought, for example the [Passive House Planning Package](#) (PHPP 10). Alternatively [CIBSE TM54 Evaluating operational energy use at the design stage](#) (2022).
80. It is also possible to target best practice by setting the right fabric specification and design requirements as part of the project brief, and this approach may be more cost effective for smaller developments in particular. The [LETI Climate Emergency Design Guide](#) sets out more detailed thermal and other building fabric performance specifications that need to be met to achieve the KPIs recommended in this design guide.

Future proofing heating technology

81. As previously noted an essential feature of net zero carbon buildings is the use of low carbon sources of heat with no connection to the gas network. Heat pumps²⁴ are considered the most efficient low carbon heat source, significantly more efficient than direct electric heating as they generate 3-4 units of heat for each unit of electricity used. They should be specified wherever possible.
82. If specification of a gas or oil-fired boiler cannot be avoided in a new build, the CCS accompanying the planning application should directly address all the following matters in this section, as part of achieving or getting as close as is practicable to being zero carbon ready.
83. A responsible designer should ensure that the building can be easily retrofitted by making adequate provision in the initial design to ensure that a heat pump can be installed in the future with a minimum of cost and disruption. Any proposed building that would require extensive modifications to fit and efficiently operate with a heat pump cannot be considered local plan compliant in terms of being future proofed for climate change, let alone zero carbon ready.
84. A heat pump system typically requires a dedicated external space for a heat pump unit, sited where its operational noise will not disturb occupants or neighbours’ sleep, and internal space nearby for a control system and a hot water cylinder. Sufficient space will be needed in the building and its curtilage, and these future installation spaces should be clearly identified on submitted plans.

²³ Further information on construction standards and airtightness is provided in [The Net Zero Carbon Toolkit](#)

²⁴ Further information on heat pumps is provided in the [The Net Zero Carbon Toolkit](#)



- 85. Wherever a typical ‘wet’ heating system is installed with a gas or oil boiler feeding radiators or underfloor heating, the designer must ensure that the pipe diameters and heat radiating fixtures are sufficiently large to supply enough heat when attached to a heat pump with a lower flow temperature. The level of building insulation and thermal efficiency may also be relevant. Making changes retrospectively to the building fabric or to the heating system is likely to be costly and disruptive.
- 86. For an air-to-water heat pump BS EN 14511²⁵ specifies a return and flow temperature of 40°C and 45°C respectively. The Building Regulations Part L (2021), Annex D, provides a reference design flow temperature value of 45°C for air source heat pump and radiators in a new dwelling. Note that heat pumps are usually more efficient operating at 30-35°C, and the Building Regulations set a maximum flow temperature of 55°C for residential gas boilers²⁶.

Designing out overheating risks

- 87. This section focuses on overheating risks can be reduced by good design and site masterplanning decisions early in the building design process. The aim should be to avoid unnecessary additional carbon emissions by using natural and design-based ventilation and cooling mechanisms, resorting to air conditioning only where there is no practicable alternative.
- 88. At building level, the Building Regulations regulate overheating (Part O: Overheating) and ventilation (Part F) based on the detailed building design. Part O applies to residential development only, requiring that all practicable passive means of limiting unwanted solar gains and removing excess heat have been used first before adopting mechanical cooling. Where the Building Regulations compliance process includes thermal modelling, the modelling process should include a summer design year (DSY) file with 2050 and 2080 climate scenarios. Building Regulation compliance outputs may usefully form part of the information provided under CCS section 5.

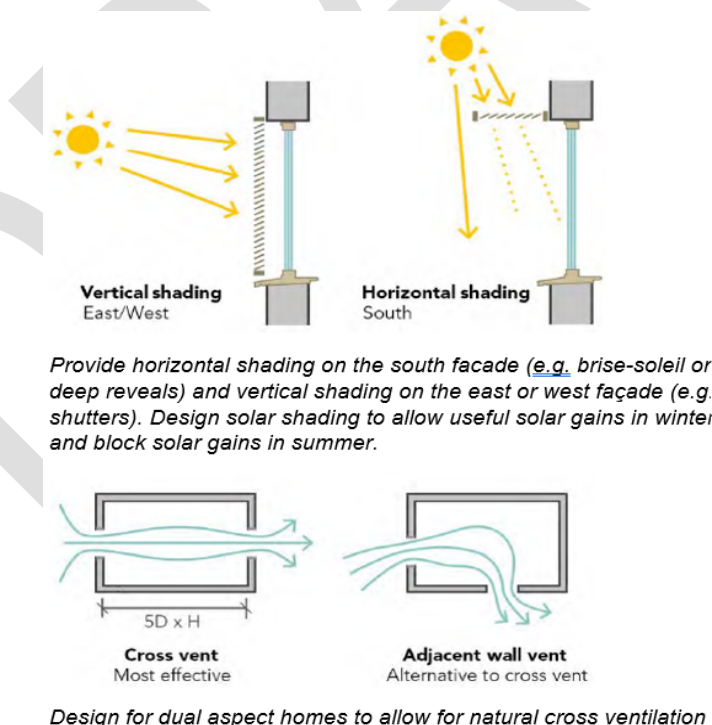


Figure 12: Overheating reduced by good design

²⁵ BS EN 14511: 2022 - Air conditioners, liquid chilling packages and heat pumps with electrically driven compressors for space heating and cooling

²⁶ Part L 5.10



89. Design measures to avoid overheating include the following

- Ensuring glazing areas are not excessive i.e., not more than 20-25% of facade on south or west façades.
- Avoiding fixed panes and maximise opening areas of windows. Side hung windows typically allow more ventilation than top hung.
- Favouring dual aspect homes and other buildings to allow cross ventilation.
- Providing appropriate solar shading. South façades should have horizontal shading over the window and the west façade should ideally have movable vertical shading e.g., shutters.
- Avoiding relying on internal blinds, which can be removed by residents.
- Selecting a g-value (the solar factor indicating how much heat is transmitted from the sun) for glass of around 0.5 where possible.

90. For residential developments use of the [Good Homes Alliance Overheating in New Homes Checklist](#) (reproduced at Appendix 2) is recommended for overheating risk assessment early in the design process. It is intended to be used prior to the detailed design stage before planning submission and approval. Parts of the tool will also be useful for non-residential development.

91. A balanced approach is needed to optimise natural daylight, maximise winter solar gain, avoid excess summer solar gain and achieve good indoor air quality with high airtightness standards. Where noise is also a consideration use the Acoustics and Noise Consultants (ANC) [Acoustics, Ventilation and Overheating Residential Design Guide](#) to determine an approach to acoustic assessment.

On-site renewable energy generation

92. As noted under KPIs, net zero carbon in operation can only be achieved by meeting the energy needs of the development using renewable electricity generation provided for the development, as fossil fuels are still used to produce mains electricity.

93. Solar PV panels installation is the generally recommended approach, a simple, mature and reliable renewable energy technology. They are a particularly good match for heat pumps, as much of the electricity generated outside peak use periods can be used to heat water or charge electric vehicles for later use. However, when considering the deployment of on-site renewable generation, consideration needs to be given to local context, including the character of the area. PV tiles are an alternative that may be more appropriate on heritage buildings or in conservation areas. Further information on PV systems is provided in the Net Zero Carbon Toolkit, the best examples convert solar energy more efficiently and have a longer lifespan.

94. A key advantage of PV is that it can be usually provided on-site as part of the development process without additional land take. The majority of new homes have sufficient space on site to generate as much energy as they need on an annual basis, especially if the roof design is optimised to make best use of southerly aspects. PV can also be mounted over parking areas and on south facing walls. The latter is less efficient than roof mounting, but it can improve power generation in winter months when the sun is lower and energy demand is higher.

95. The Net Zero Carbon Toolkit also refers to the benefits of smart controls with demand flexibility. These systems enable energy to be consumed, retained and released according to specific energy demands. Energy storage is an essential component of these systems.



Embodied carbon

96. For development embodied carbon emissions are associated with the extraction, processing, production and transportation of building materials and products, and in the construction of the building. Embodied carbon arises after the building is completed from its maintenance and the demolition and disassembly of the building at the end of its life. As a result, there are significant carbon benefits from retaining existing buildings and adapting them where appropriate, rather than demolishing them for new build.
97. Whilst embodied carbon is not currently (2024) covered by the Building Regulation or any other statutory controls, over time embodied carbon will become an even more significant proportion of whole-life carbon and commensurately more important to achieving zero carbon development. This is because:
 - Carbon emission from operational energy consumption will reduce independently of measures by developers or occupier behaviour as the National Grid decarbonises electricity supply; and
 - As new buildings become more energy efficient to run and switch to low carbon heating sources, operational carbon emission will become a smaller proportion of total carbon emissions than they are currently.
98. As building materials typically account for around 60-70% of the embodied carbon in a development, it is essential to consider embodied carbon at the start of the design process. Low embodied carbon design is not inherently more expensive or more complex, it often just requires awareness, good design and specification informed by the use of appropriate carbon calculation tools for building products, systems and processes.
99. Developers should demonstrate in their CCS submissions that they are taking active steps to reduce the embodied carbon and embed a sustainable approach to resource use in their developments, for example by an appropriate combination and balance of the following measures, wherever applicable and feasible.

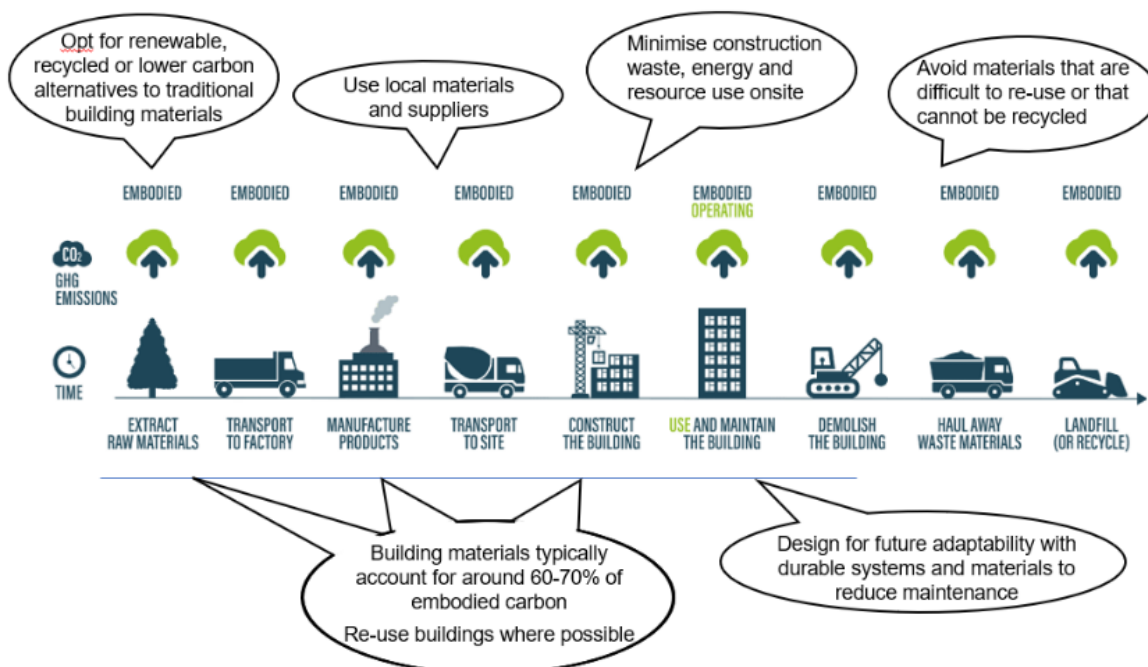


Figure 13: Reducing carbon emissions embodied in construction²⁷

²⁷ Image copyright and re-used with the permission of [Buildpass](https://www.buildpass.com/)



What can you do?

- 1 Refurbishment over new build**
Only build new when existing homes cannot be reused or refurbished.
- 2 Lean design**

Structural: Design structure for 100% utilisation. Use bespoke loading assumptions, avoid rules of thumb. Reduce spans and overhangs.

Architectural: Use self-finishing internal surfaces. Reduce the quantity of metal studs and frames.

Building services: Target passive measures (e.g. improved fabric) to reduce the amount of services. Reduce long duct runs, specify low Global Warming Potential (GWP) refrigerant (max. 150) and ensure low leakage rate.
- 3 Material and product choice**

Prioritise materials that are reused, reclaimed or natural from local areas and sustainable sources and that are durable. If not available use materials with a high recycled content. Use the following material hierarchy to inform material choice particularly for the building structure;

1. Natural materials e.g. timber	3. Light gauge/Cold rolled steel
2. Concrete and masonry	4. Hot rolled steel

Ask manufacturers for Environmental Product Declarations (EPD) and compare the impacts between products in accordance with BS EN 15804
- 4 Housing adaptation & flexibility**
Allow for flexibility and consider how a layout may be adapted in the future.
- 5 Easy access for maintenance**
Maintained equipment will last longer.
- 6 Design for disassembly**
Consider disassembly to allow for reuse at the end of life of the building. Create material passports for elements of the building to improve the ability of disassembled elements to be reused.



Figure 14: Design for adaptation using a flexible floor plan e.g., one bed flat can be converted to a two-bed flat or a one bed flat with space for home working.



Facilitating sustainable transport

100. Carbon emissions reductions can be made by reducing the need to travel, and by enabling lower carbon travel choices such as active travel (walking and cycling) for trips that need to be made.
101. Convenient and secure cycle storage is effective in encouraging journeys by bike. Consider how can they be integrated into the design. See the [NFDC Parking Standards SPD \(2022\)](#) for further guidance.
102. Consider how the home can support effective homeworking to help reduce unnecessary commuting. Are there sufficient plug and internet connectivity sockets? Is there room for a home office space?
103. The Building Regulations now require that new properties be supplied with electric vehicle charging points, in most circumstances. Faster and higher capacity chargers will be helpful especially for households with more than one electric vehicle.

Building for a Healthy Life

104. The [Building for a Healthy Life \(BFHL\)](#) design approach is recommended to help achieve active, well-connected and healthy communities, including by promoting sustainable movement and active travel. BFHL is backed by the NHS and endorsed and used by Homes England. BFHL is a collaborative design approach and process based on twelve design considerations organised into three themes: integrated neighbourhoods, distinctive places and streets for all. THE BFHL approach is aligned to Manual for Streets, the NPPF and the National Model Design Code.
105. The twelve BFHL considerations should be addressed from the start of the design process. The recommended approach is for the council and developers to discuss and agree at pre-application advice stage what best practice outcomes can and should be achieved under each consideration for that particular site and development.
106. The BFHL process culminates in an independent assessment of the development proposal, rating each consideration as green (achieves best practice), red (stop and rethink) or amber (try and improve). The aim is to achieve 12 green ratings where possible, and no avoidable amber ratings (some outcomes might be beyond the developer's control, e.g., if they require unobtainable access to third party land). As the target best practice outcomes are tuned for the specific development, all red ratings are avoidable and should be designed out.

Reducing flood risk through Sustainable Urban Drainage Systems (SuDS)

107. Changes to our climate are predicted to result in increased rainfall and greater risk of flooding, including from the inundation of existing drains not designed for current conditions.
108. National Planning Practice Guidance on [Flood risk and coastal change](#) was significantly updated in 2022, requiring that flood risks including surface water management is fully considered from the outset of the planning application and Local plan-making processes.
109. NPPG changes reflect the national policy position that 'major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate²⁸'. Integrating SuDS into a development can greatly improve the site's ability to capture, absorb and effectively retain water as part of a comprehensive green infrastructure design. Compared to the traditional approach of using underground pipes and tanks discharging to sewers to manage drainage, a surface-based SuDS approach can reduce

²⁸ NPPF para 173



total surface water run-off and support local drainage networks to function effectively, reducing the risk of flooding and untreated sewage discharges from overloaded sewers.

- 110. Where SuDS are provided, SuDS design should underpin the earliest stages of site masterplanning following the approach set out in the Construction Industry Research and Information Association (CIRIA) [SuDS Manual](#) (C753). The SuDS Manual explains how to maximise SuDS benefits for water quantity, water quality, amenity and biodiversity (the '4 pillars' of SuDS). The CIRIA approach treats surface water as a valuable resource that if appropriately managed can improve climate change resilience, enhance biodiversity, and add to the beauty and amenity of developments.
- 111. Provided that they are constructed in accordance with the SuDS Manual, water companies may formally adopt SuDS as part of the drainage network they manage. This is an outcome developers should actively pursue.
- 112. CIRIA guidance C808 [Using SuDS to reduce phosphorus in surface water runoff](#) (December 2022) explains how SuDS design can mitigate at source environmental impacts from phosphorus on the water environment. This approach addresses pollution impacts at source in accordance with the proximity principle, reducing the nutrient mitigation cost for the development. It should be followed for development in the Avon catchment. Additional funding is secured to extend this guidance to mitigating nitrogen runoff, and once published this approach should be followed in Solent catchments.

Managing residual flood risks

- 113. NFDC considers that the updated NPPG approach and the requirements it places on developers to prepare flood risk assessments is now sufficiently precautionary to ensure early and more holistic consideration of water flood risks, including allowances for climate change²⁹. However there will still be some residual risks in some locations from infrequent extreme events, and these need to be recognised and properly addressed in the design approach.
- 114. Where flood risks cannot be fully eliminated but development is on balance justified under national policy, the overall development design should include a strategy to safely manage (absorb, channel, contain or delay) flows that exceed the design capacity of the drainage system, including any SuDS, specified in accordance with CIRIA [Designing for exceedance in urban drainage](#) - good practice (C635F). This document provides best practice advice for the design and management of urban sewerage and drainage systems to reduce or mitigate the impacts that arise when flows occur that exceed their design capacity. Example measures could include the design of safe and resilient flood overflow routes and temporary flood storage areas.
- 115. Where necessary flood resilience should also be designed into buildings, following the CIRIA [Code of practice for property flood resilience](#) (C790A) e.g. measures such as raised floor levels, water barriers to building openings or the use of materials or siting of services that would reduce recovery time and cost if a building is flooded.

Drought resilience and using water efficiently

Reducing mains water use

- 116. New Forest District is within a wider water stressed area identified by the Environment Agency. Recent rainfall levels already make it challenging to sustainably meet mains water demand without adversely affecting nationally and internationally protected habitats. The climate trend to drier and hotter summers may exacerbate these issues, potentially increasing the frequency of periodic controls such as summer hosepipe bans.

²⁹ [Flood risk assessments: climate change allowances - GOV.UK \(www.gov.uk\)](https://www.gov.uk)



117. Making more effective use of both mains and natural water resources will become an increasingly important part of living within environmental limits, with beneficial CO₂e emission savings possible from cumulative reductions to water supply and treatment. The measures in this section build on the SuDS approach that treats naturally available water on development sites as a valuable resource.
118. The Building Regulations set mains water use standards. Local Plan **Policy IMPL2: Development Standards** requires that new residential development is designed to meet the higher Building Regulations water efficiency standard of under 110 litres per person per day.
119. For residential developments in particular, more water efficient and sustainable measures are encouraged to help reduce water use further, to future-proof developments. Southern Water are championing [Target 100](#), supporting personal consumption reductions to achieve a 100 litre per person per day standard.
120. More efficient water fittings and appliances will help, provided they are not later replaced with less efficient systems. Wherever appropriate water use efficiency should be evaluated using the 'Fittings Based Approach' as set out in section 2 and Tables 2.1-2.2 of [Buildings regulations Approved Document G: Sanitation, hot water safety and water efficiency](#).
121. More enduring approaches could include rainwater harvesting (RWH) and grey water recycling (GWR) systems to reduce demand for treated mains drinking water for non-potable uses. The simplest example of rainwater harvesting is a water butt for garden watering and outdoor cleaning, connected to guttering downpipes. A roof of 60sqm (a typical terraced house) would receive around 50,000 litres rainfall per annum in southern England. More sophisticated rainwater harvesting systems are encouraged, such as rainfall storage tanks integrated into plumbing systems for non-potable use (potable use may be possible where on-site treatment is practicable).
122. Greywater recycling is the re-use of wastewater from sinks, showers, baths, washing machines or dishwashers, usually for non-potable use: to flush toilets, wash clothes and water gardens or green spaces. About 70% of water used in the home is discharged as greywater, so unlike rainwater it is a seasonally consistent source of water for re-use. In-home re-use requires installation of a 'dual' plumbing system, which is most cost-effective to provide during construction.

Drought resilience in the public and private realm

123. To be self-sustaining and climate resilient, planting strategies for both public spaces and private gardens will need to consider both the warming climate and potentially available water. Equally, the design of the built environment and choice of drainage approach and mechanisms should ensure that naturally available water supports the green and blue infrastructure provided, now and in the future.
124. The alignment of green infrastructure and SuDS provision is an obvious opportunity to improve drought resilience. The default use of permeable materials for hard surfaces and bio-retention mechanisms such as rain gardens, swales and green roofs are recommended wherever practicable, to enable natural infiltration to support groundwater recharge as well as to reduce or slow drainage run-off. Scope to use runoff in SuDS or storage tanks for greenspace watering and public realm cleaning could also be explored if necessary e.g., in more urbanised contexts. Other useful resources include:
- Watersafe: [Developing Water Efficient Homes](#)
 - Waterwise: [Advice on Water Efficient Homes for England](#)



Supporting ecology, biodiversity and nature-based solutions

125. The Council has declared a nature emergency as well as a climate emergency, as they are inextricably linked. Enhancing biodiversity and providing green and blue infrastructure is encouraged in new developments. It will help to increase the capacity of the environment to absorb CO₂e emissions in the local area. Maintaining and enhancing biodiversity and green infrastructure will also benefit occupants, the wider community and economy by supporting health and wellbeing, providing surface water management and flood resilience, absorbing pollutants improving local air quality, providing local shading and wider air cooling, as well as providing habitats for wildlife.
126. Since 2020 the Council has sought a minimum of 10% biodiversity net gain as a requirement of planning permission for ‘major’ new build development (10+ homes, or at least 1,000 sqm of other development), pursuant to Local Plan **Policy STR1: Achieving Sustainable Development**. Further details are set out in the [Ecology and Biodiversity net gain - Interim Advice and Information Note](#). Updated guidance will be provided in a future Biodiversity Supplementary Planning Document..
127. Nature-based solutions involve the restoration of ecosystems for the long-term benefit of people and nature. Examples include expansion of tree and woodland cover; restoration and creation of priority habitats; natural floodplain management including sustainable urban drainage systems (SuDS). Nature-based solutions can address multiple issues simultaneously, e.g. flood risk, air and water equality, biodiversity, and health and wellbeing of people. Natural England’s report [Carbon Storage and Sequestration by Habitat 2021](#) provides detailed guidance. New Forest District Council is part of the Partnership for South Hampshire and part of the Council’s area benefits from inclusion in the South Hampshire Green Infrastructure [Strategy](#) and [South Hampshire Green Infrastructure Implementation Plan](#). High quality green and blue infrastructure provides multiple benefits for both climate change mitigation and adaptation and the guidance in the PFSH document is not repeated here.





Appendices

DRAFT



Appendix 1: Local Plan 2020 - climate change related policies

Policy STR1: Achieving sustainable development

“All new development will be expected to make a positive social, economic and environmental contribution to community and business life in the Plan Area by...

- v. Ensuring communities and workers are safe and feel safe, and the risks to people, places and to the environment from potential hazards including pollution, flooding and climate change effects are minimised;
- vi. Ensuring that new development is adaptable to the future needs of occupiers and future-proofed for climate change and innovations in transport and communications technology.”

Policy ENV3: Design quality and local distinctiveness

“... New development will be required to: ...

- v. Incorporate design measures that improve resource efficiency and climate change resilience and reduce environmental impacts wherever they are appropriate and capable of being effective, such as greywater recycling and natural heating and cooling, and the use of Sustainable Urban Drainage Systems (SUDS); ...”

Policy CCC1: Safe and healthy communities

“iv. In the interests of public safety, vulnerable developments will not be permitted (a) Within the defined Coastal Change Management Area at Barton-on-Sea to Milford-on-Sea unless in accordance with Saved Policy DM6: Coastal Change Management Areas; (b) In areas at risk of flooding unless in accordance with the sequential and exceptions tests”

Policy CCC2: Safe and sustainable travel

“New development will be required to:

- i. Prioritise the provision of safe and convenient pedestrian access within developments, by linking to and enabling the provision of more extensive walking networks wherever possible, and where needed by providing new pedestrian connections to local facilities;
- ii. Provide or contribute to the provision of dedicated cycle routes and cycle lanes, linking to and enabling the provision of more extensive cycle networks and providing safe cycle routes to local schools wherever possible ...
- v. Incorporate infrastructure to support the use of electric vehicles ...”

Policy IMPL2: Development Standards

“New development will meet or exceed the following standards and requirements to help minimise their environmental impact and/or to be adaptable to the future needs of occupiers over their lifetime...

- ii. The higher water use efficiency standard in accordance with Part 36(2) (b) of the Building Regulations, currently a maximum use of 110 litres per person per day.
- iii. New commercial developments of 250 - 999 sqm gross internal area (GIA) are required to achieve Building Research Establishment Environmental Assessment Method (BREEAM) excellent standard in the water consumption criterion. Commercial development of 1,000 sqm or more GIA is also required to achieve BREEAM excellent standard overall.
- v. Provision of a high-speed fibre broadband connection to the property threshold.
- vi. Provision to enable the convenient installation of charging points for electric vehicles in residential properties and in residential, employee and visitor parking areas.”

Saved Policy DM6: Coastal Change Management Area (CCMA)

[Defines an area where development is restricted due to erosion and land instability risks].



Appendix 2: Climate Change Statement Information Proforma

See the Net Zero Carbon Toolkit for further information and guidance.

Climate Change Mitigation and Zero Carbon		
Aspect / requirement	Designed	Developer comments (description/justification/calculations/assumptions)
CCS 1: Minimising energy demand and targeting net zero carbon in operation		
CCS 1a: Minimising energy demand by design		
Electrical energy demand	___ kWh / pa	
Installed renewable electrical capacity (target: 35 kWh/m ² GIA/year)	___ kWh solar PV / wind / CHP / district heat network	
Insulation	At / above building regs	
Low carbon lighting installed	Yes / No	
Energy efficient appliances included	Yes / No	
Orientation for solar gain	Yes / No	
Orientation for PV optimisation	Yes / No	
Passive ventilation installed	Yes / No	
Passive shading installed	Yes / No	
CCS 1b: Low carbon heating systems		
Heat type	Gas / Heat pump / Electric other	
Zero Carbon ready (if not met)	Yes / No	
CCS 1c: Energy use and carbon calculations		
Total operational energy demand (EUI) (target: under 35kWh/m ² GIA/year)	___ kWh/m ² GIA/year	
Building CO ₂ e	___ CO ₂ e/m ² GIA/year	
Space heat demand (target: 15 kWh/m ² GIA/year)	___ kWh/m ² GIA/year	
Whole development CO ₂ e	CO ₂ e/tonnes/year	
CCS 1d: Smart energy systems		
Smart energy use system (smart meter)	Yes / No	
Heating controls/system	Yes / No	
Renewable energy generator monitor	Yes / No	



Installed demand response measures	Yes / No	
CCS 1e: future proofing statement		
<i>If heat pump not installed:</i> Future proofing for heat pump statement		[text]
CCS 1f: option to purchase heat pump pre-installation		
<i>If heat pump not installed:</i> Buyer able to purchase heat pump system from developer at discounted supplementary cost?	Yes / No	
CCS 2: Onsite renewable energy generation		
CCS 2a: onsite renewable energy		
Description of renewable approach		[text]
CCS 2b: renewable energy generation calculation		
Onsite renewable energy generation total (target: 120 kWh/m ² /year)	___ kWh/year ___ % of 120 kWh/m ² /year ___ % of EUI (see SSC 1: 1c)	
Onsite renewable energy generation per m ² of building development footprint	___ kWh/year ___ % of 120 kWh/m ² /year ___ % of EUI (see SSC 1: 1c)	
Is regulated energy use met by onsite renewable generation? If no, please justify how best outcome achieved	Yes / No	
CCS 2c: Option to purchase PV pre-installation		
<i>If PV not installed:</i> Buyer able to purchase PV system from developer at discounted supplementary cost?	Yes / No	
CCS 3: Embodied carbon		
CCA 3a: Reducing embodied carbon in the construction process		
Describe steps taken to reduce emissions in the construction process e.g. sourcing and type of materials		[text]
CCA 3b: Reducing embodied carbon for the full lifecycle of the building (all major developments of 50+ dwellings or 1000m ² GIA of other uses)		
Describe steps taken to reduce emissions for the full lifecycle of the building e.g. sourcing		[text]



and type of materials, maintenance considerations, end of life options		
CCS 4: Sustainable travel		
CCS 4a: Cycle parking and EV charging		
Number of secure and accessible cycle parking space	___ total ___ per dwelling / building	
Number of EV chargers installed	___ total ___ per dwelling / building	
Capacity of EV chargers installed	kWh	
Site EV ready only	Yes / No	
CCS 4b: Building for a healthy life (residential development 50+ homes only)		
Has the 'Building for a Healthy Life' design toolkit been used?	Yes / No	
Out of the 12 considerations, how many have been agreed as 'green' rated overall by the planning officer(s)?	___ / 12	

Climate Change Adaptation		
Aspect / requirement	Designed	Developer comments (description/justification/calculations/assumptions)
CCS 5: Avoiding Overheating		
CCS 5a: Natural heatwave mitigation (all major development)		
Describe how heatwave mitigation has informed the planting and landscaping strategy		[text]
Describe how heatwave mitigation has informed the choice of building materials and surfaces e.g. orientation, cross-ventilation		[text]
CCS 5b: Overheating		
Provide the overall score and rating from the Good Homes Alliance Early-Stage Overheating Risk Tool (pg.7)	___ / high/medium/low	
CCS 5c: Mechanical Ventilation and Heat Recovery		



Will MVHC be provided?	Yes / No	
CCS 6: Flood risk reduction and sustainable drainage systems (SuDS)		
CCS 6a: Managing surface water run-off		
Will the development include any hard standing or paved surfaces that would not be water permeable?	Yes / No	
CCS 6b: Sustainable Drainage Systems (SuDS)		
Describe how SuDS have been designed and specified as an integrated part of the site design		[text]
CCS 6c: Flood resilience measures		
Summarise and provide a cross-reference to the section of the Flood Risk assessment that addresses proposed flood prevention and flood resilience measures		[text]
CCS 7: Drought resilience and using water efficiently		
CCS 7a: Reducing mains water use		
Confirm water use efficiency standard the development is specified to achieve (target: 110 litres / person / day)	___ litres / person / day	
Will water butts be provided in all gardens/yard spaces?	Yes / No	
Describe any other water efficiency measures proposed e.g. grey water recycling, water flow restrictors		[text]



Appendix 3: Good Homes Alliance early stage overheating risk tool

The Good Homes Alliance website³⁰ provides guidance on use of the tool.

EARLY STAGE OVERHEATING RISK TOOL Version 1.0, July 2019

This tool provides guidance on how to assess overheating risk in residential schemes at the early stages of design. It is specifically a pre-detail design assessment intended to help identify factors that could contribute to or mitigate the likelihood of overheating.

The questions can be answered for an overall scheme or for individual units. Score zero wherever the question does not apply. Additional information is provided in the accompanying guidance, with examples of scoring and advice on next steps.

Find out more information and download accompanying guidance at goodhomes.org.uk/overheating-in-new-homes.



KEY FACTORS INCREASING THE LIKELIHOOD OF OVERHEATING | **KEY FACTORS REDUCING THE LIKELIHOOD OF OVERHEATING**

Geographical and local context			
#1 Where is the scheme in the UK? <small>See guidance for map</small>	South east	4	
	Northern England, Scotland & NI	0	
	Rest of England and Wales	2	
#2 Is the site likely to see an Urban Heat Island effect? <small>See guidance for details</small>	Central London (see guidance)	3	
	Grtr London, Manchester, Bham	2	
	Other cities, towns & dense sub-urban areas	1	
#8 Do the site surroundings feature significant blue/green infrastructure? <small>Proximity to green spaces and large water bodies has beneficial effects on local temperatures; as guidance, this would require at least 50% of surroundings within a 100m radius to be blue/green, or a rural context</small>		1	

Site characteristics			
#3 Does the site have barriers to windows opening? <small>- Noise/Acoustic risks - Poor air quality/smells e.g. near factory or car park or very busy road - Security risks/crime - Adjacent to heat rejection plant</small>	Day - reasons to keep all windows closed	8	
	Day - barriers some of the time, or for some windows e.g. on quiet side	4	
	Night - reasons to keep all windows closed	8	
	Night - bedroom windows OK to open, but other windows are likely to stay closed	4	
#9 Are immediate surrounding surfaces in majority pale in colour, or blue/green? <small>Lighter surfaces reflect more heat and absorb less so their temperatures remain lower, consider horizontal and vertical surfaces within 10m of the scheme</small>		1	
#10 Does the site have existing tall trees or buildings that will shade solar-exposed glazed areas? <small>Shading onto east, south and west facing areas can reduce solar gains, but may also reduce daylight levels</small>		1	

Scheme characteristics and dwelling design			
#4 Are the dwellings flats? <small>Flats often combine a number of factors contributing to overheating risk e.g. dwelling size, heat gains from surrounding areas; other dense and enclosed dwellings may be similarly affected - see guidance for examples</small>	3		
#5 Does the scheme have community heating? <small>i.e. with hot pipework operating during summer, especially in internal areas, leading to heat gains and higher temperatures</small>	3		
#11 Do dwellings have high exposed thermal mass AND a means for secure and quiet night ventilation? <small>Thermal mass can help slow down temperature rises, but it can also cause properties to be slower to cool, so needs to be used with care - see guidance</small>		1	
#12 Do floor-to-ceiling heights allow ceiling fans, now or in the future? <small>Higher ceilings increase stratification and air movement, and offer the potential for ceiling fans</small>	>2.8m and fan installed	2	
	> 2.8m	1	

Solar heat gains and ventilation			
#6 What is the estimated average glazing ratio for the dwellings? <small>(as a proportion of the facade on solar-exposed areas i.e. orientations facing east, south, west, and anything in between). Higher proportions of glazing allow higher heat gains into the space</small>	>65%	12	
	>50%	7	
	>35%	4	
#7 Are the dwellings single aspect? <small>Single aspect dwellings have all openings on the same facade. This reduces the potential for ventilation</small>	Single-aspect	3	
	Dual aspect	0	
#13 Is there useful external shading? <small>Shading should apply to solar exposed (E/S/W) glazing. It may include shading devices, balconies above, facade articulation etc. See guidance on "full" and "part". Scoring depends on glazing proportions as per #6</small>		Full	Part
		>65%	6 3
		>50%	4 2
		>35%	2 1
#14 Do windows & openings support effective ventilation? <small>Larger, effective and secure openings will help dissipate heat - see guidance</small>	Openings compared to Part F purge rates = Part F +50% +100%	Single-aspect minimum required	3 4
		Dual aspect	2 3

TOTAL SCORE = Sum of contributing factors: minus Sum of mitigating factors:



score >12: Incorporate design changes to reduce risk factors and increase mitigation factors AND Carry out a detailed assessment (e.g. dynamic modelling against CIBSE TM59)	score between 8 and 12: Seek design changes to reduce risk factors and/or increase mitigation factors AND Carry out a detailed assessment (e.g. dynamic modelling against CIBSE TM59)	score <8: Ensure the mitigating measures are retained, and that risk factors do not increase (e.g. in planning conditions)
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³⁰ <https://goodhomes.org.uk/wp-content/uploads/2019/07/GHA-Overheating-in-New-Homes-Tool-and-Guidance.pdf>



Appendix 4 Case studies for new build

Ultra-low energy design is fast becoming the new normal

128. The energy efficiency of new homes is increasing year on year. Many self-builders and developers go beyond building regulations for energy efficiency because it makes sense. Not only can low energy building be cheaper to run, they can also be easier and cheaper to maintain and crucially, will not need further expensive retrofit in the future.

Beautiful and efficient homes

129. Lark Rise in the Chiltern Hills is certified to Passivhaus Plus standards. It is entirely electric and generates 2.5 times as much energy as it consumes in a year. Carefully optimised design has meant that it has a mostly glazed facade, minimal heat demand and stable temperatures over summer months.

Passivhaus/Ultra-low energy can be delivered at scale

130. Developers are building Passivhaus at scale. At the lower end Hastoe's development at Wimbish, Essex is a mixture of 14 houses and flats, certified to Passivhaus standards. The average heating costs for the houses are £130/year (2020). The development is operating as designed and has effectively eliminated the 'performance gap'.

131. Other examples include Springfield Meadows in Oxfordshire and Agar Grove in Camden. At nearly 500 homes [Agar Grove estate regeneration](#) in Camden, London, will be the largest Passivhaus development in the UK once completed. Phase 1A is occupied.



Lark Rise, Chiltern Hills. Passivhaus Plus certified. (Source: Bere: architects)



Springfield Meadows (Source: Greencore construction with Bioregional)



Wimbish, Passivhaus certified. (Source: Hastoe Housing Association)



Appendix 5: What to do when? Checklist for design and construction

RIBA Stage 2 & 3

RIBA Stage 2 - Concept Design	✓	RIBA Stage 3 - Spatial Coordination	✓
Optimise building orientation to balance solar gain and increase south facing roof area. Design roof to maximise density of renewables.		Review mark-up of insulation line on all plans and sections and carry out initial U-value calculations.	
Calculate and report the building form factor for design options.		Carry out heating options appraisal including a low carbon option.	
Arrange embodied carbon workshops with design team to target lean design principles and reduce big tickets items e.g. structure.		Hold a thermal bridge workshop. Include the structural engineer for review of columns, masonry support etc.	
Identify design team members to carry out embodied carbon assessment. Carry out multiple embodied carbon calculations of key elements to demonstrate low carbon design choices.		Provide MVHR layout including duct distribution and measurement of intake and exhaust duct lengths to external walls for sample dwellings.	
Mark-up insulation line on all plans and sections. Mark unheated external areas on plans.		Carry out full embodied carbon assessment of whole building and compare against embodied carbon target. Implement reductions where necessary.	
Allow sufficient wall construction thickness for all insulated walls, roofs and floors.		MEP consultant to review embodied carbon impact of services and reduce the amount of kit where possible. Use CIBSE TM65 embodied carbon in building services to assess impact.	
Mark window openings for providing natural ventilation for summer comfort.		Carry out PHPP modelling alongside SAP calculations. List all model assumptions including U-values, thermal bridges and system specifications etc.	
Identify a location for the MVHR next to an external wall.		Carry out overheating assessment and eliminate overheating through passive strategies where possible (TM59). Ensure all element assumptions match PHPP and SAP models.	
Carry out preliminary overheating risk assessment using the Good Homes Alliance overheating checklist.		Calculate electricity generation intensity of PV arrays and review against KPI.	
Carry out initial PHPP model.		Define airtightness strategy and identify airtightness line on plans and sections.	
For projects using Passivhaus certification this is a good time to consider an appointment.		Measure heating and hot water pipe lengths for sample dwellings. Minimise distribution or standing losses.	
		Demonstrate distribution losses have been calculated and reduced.	
		Prepare RIBA Stage 3 report and include predicted operational cost to tenant.	

MVHR: Mechanical Ventilation with Heat Recovery

PHPP: Passivhaus Planning Package

This design checklist provides a list of key actions that should be carried out at each work stage to meet the KPI targets for new homes.

This should be shared with the project's design team to check off after each stage is complete.



Checklist for design and construction: RIBA Stage 3+, 4,5 & 6

RIBA Stage 3+ - Early Technical Design (and tender)		✓
Detail build-ups of all external elements including thickness and conductivity of all materials.		
Detailed U-value calculations (including masonry support system, etc.).		
Identification of all thermal bridge junction types (e.g. parapet A, parapet B).		
Thermal bridge calculations for a selection of the most important junctions.		
Definition of airtightness testing requirements for contractor.		
Include requirements for Environmental Product Declarations (EPD) in the tender. Make EPDs obligatory for structural materials, primary façade and any other major materials.		
Include KPI requirements in the tender.		
Agree scope of Post-Occupancy Evaluation in tender. Identify level of participation from contractor and design team.		
RIBA Stage 4 - Technical Design (in addition to Stage 3+)		✓
Develop junction details for window and doors.		
Review airtightness line on each drawing and identification of airtightness requirements for service penetrations.		
Carry out a thermal bridge workshop to review thermal bridge lengths and calculate Psi-values for all junctions.		
Review MVHR layout including duct distribution and measurement of length of intake and exhaust ducts for all homes.		
Measure heating and hot water pipe lengths for all communal areas and homes.		
Carry out embodied carbon assessment of whole building using accurate Bills of Quantities.		
Specify high performing PV panels.		

RIBA Stage 5 - Manufacturing and Construction		✓
Run an introduction to ultra-low energy construction workshop on-site.		
Encourage site manager and team training on construction quality requirements covering insulation and airtightness.		
Prepare toolbox talk information for site team inductions on low energy construction quality.		
Review alternative materials or products proposed by the contractor. Ensure substitutions do not compromise the thermal performance or embodied carbon target.		
Carry out regular construction quality assurance site visits and reports (depending on the size of the scheme – at least six) in tandem with regular visits.		
Develop site quality tracker, assess against KPIs and update regularly.		
Require leak finding airtightness tests at first fix and second airtightness test pre-completion.		
Witness commissioning of MVHR systems and heating system.		
Carry out predicted in-use energy model of each building leading to the final 'as built' PHPP model.		
Consider recalculating embodied carbon using 'as built' information.		
RIBA Stage 6 - Handover		✓
Provide building and operational information to residents in the form of site inductions and simple building user guides and instructions (e.g. sticker on MVHR for filter replacement).		
Consider embodied carbon as part of the replacement and maintenance strategy and include in the O&M manual.		
Carry out post-occupancy evaluation during first 5 years of use and verify KPIs have been met.		
Lessons learnt project review with design team.		
Publicly report KPIs.		

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PLACE AND SUSTAINABILITY OVERVIEW & SCRUTINY PANEL - 7 MARCH 2024

PORTFOLIO – ENVIRONMENT AND SUSTAINABILITY

GRASS CUTTING PROGRAMME, SPRING 2024

1. RECOMMENDATIONS

- 1.1 That the Place and Sustainability, Overview and Scrutiny Panel note the approach to grass cutting in Spring 2024, with a “Let it Bee” campaign in support of the national No Mow May initiative.

2. INTRODUCTION

- 2.1 ‘No Mow May’ is a national campaign promoted by the environmental charity Plantlife, which advocates the cessation of grass cutting on all land during May, to encourage flowering plants and habitats for insects and butterflies reliant on pollen as a food source.
- 2.2 Further information on this national initiative can be found here:
<https://www.plantlife.org.uk/campaigns/nomowmay/>
- 2.3 In 2023, the Council trialled this approach to grounds maintenance on certain selected sites. This report summarises the results of that and proposes a way forward for 2024.

3. BACKGROUND

- 3.1 New Forest District Council has declared a ‘Climate and Nature Emergency’ and is committed to investigating practical ways to help sustain our planet.
- 3.2 As part of this commitment our Open Spaces team investigated the practicality of trialling the national campaign ‘No Mow May’ on selected areas where we implement grass cutting. Areas for which the council is responsible for grass cutting include urban highway verges, council housing land, and council offices such as Appletree Court.
- 3.3 Highway verge cutting is the responsibility of HCC. In urban areas only, NFDC are contracted by HCC to cut the verges. HCC provides funding for four cuts per annum, but under normal circumstances NFDC, at our cost, also delivers additional cuts, up to 7 in total, depending on growing season and ground conditions. This is to maximise amenity impact for residents and visitors. In recent years the grass growing season has been extended as a consequence of milder weather through the impacts of global warming.
- 3.4 More information on our grass cutting approach is found on the Council’s website at <https://www.newforest.gov.uk/grasscutting>
- 3.5 In discussion with HCC Highways, we identified suitable sites where there would be no safety implications (e.g. at junctions where sightlines must be maintained). These sites received one cut prior to May, but cutting was then suspended during May and recommenced in June. The area in the trial was 1.2km² – equivalent to 165 football pitches spread across a 300 square mile area. This revised regime would still deliver up to 5-6 cuts during the grass cutting season.

- 3.6 Grass cutting in and around sheltered accommodation and cemeteries was maintained as per normal schedules, but suspended on other areas of council housing land in line with the approach to verge mowing, and at Appletree Court.
- 3.7 Prior to implementation of the trial, our communications team worked to put out messages to town and parish councils and our own elected members in relation to the trial, then developed further messages to communicate to the wider public. Ahead of the trial, public messaging went on the council's social media accounts and in the council's resident's email in late March. After the trial period concluded in June, further public messaging was put out in the local media, on social media and in resident's emails explaining about the trial, and what had been done to support biodiversity.
- 3.8 During the time when grass cutting requirements were reduced, resources were deployed to other sites and other tasks, but it is important to remember that cutting remained in place for many sites across the district.
- 3.9 A range of feedback on the scheme was received - some residents for example felt that the schedule left areas looking untidy, whilst others applauded the biodiversity impacts. Some photos showing the outcomes of the scheme are shown in **Appendix 1**.
- 3.10 Local media coverage included [New Forest District Council goes wild with Plantlife campaign No Mow May \(advertiserandtimes.co.uk\)](https://www.advertiserandtimes.co.uk)

4 PROPOSED APPROACH IN 2024

- 4.1 The proposal is to continue to support "No Mow May" in 2024. Feedback received in 2023, plus our own operational learnings, have led to the following proposed enhancements for 2024:
- Sites which had safety concerns highlighted by the public i.e. because of impacts on sight lines, have been reviewed and if necessary will be mown.
 - To prevent larger sites appearing abandoned or unmanaged, we will frame larger sites by mowing around the periphery and provide access through selected areas for pedestrians to walk and enjoy the more natural environment.
 - The value of having space available for play/recreation will also be considered, to ensure we have a balance between mowing some areas for this purpose whilst others are left to grow.
 - The height of the first cut after May will be lifted to minimise wear and tear on grass cutting equipment.
 - Placing of signage on some larger grassed areas that explain that the area has been left unmown as part of the scheme.
 - Feedback from stakeholders, including the public, will be formally recorded and analysed in a central location.
 - Ecological sampling will take place pre- and post-scheme, to showcase some of the benefits for nature.
 - The Open Spaces team are also in discussion with the Housing section, to see where the relaxed grass cutting can be applied to certain areas of general open space on housing estates.
- 4.2 The 2024 scheme will be supported by a full communications plan. This plan will aim to:
- Inform residents and other stakeholders about the scheme.
 - Explain the importance of increasing biodiversity in the district.
 - Pro-actively answer queries that residents may have.

- Encourage wider participation from our residents – for example from their own gardens or through [The Greening Campaign : Climate change community support \(greening-campaign.org\)](https://www.greening-campaign.org).

4.3 Based on experience in 2023, some of our key messages need to include:

- Explanation of the timescales for remedial works we would undertake to return sites to their original condition. This is to reflect that once the no mowing period concludes, it is not possible to immediately visit all sites to cut the grass, so in practice some sites are unmown for a significant portion of June as well as May.
- Information on cutting heights and equipment chosen to reduce the level and impact of grass clippings. It is not viable to remove clippings because of the time and cost involved in doing so.

4.4 No Mow May is a national campaign, and we will continue to reference that in our social media communications so we can link into similar schemes across the country. However, the phrase “no mow may” doesn’t reflect the impact of this scheme across multiple months, nor the fact that we will be continuing to mow in some areas. Therefore, an overarching strapline of “Let it Bee” will be used to focus attention on the pollinator benefits.

4.5 In addition to the seasonal benefits of the “no mow may” scheme, there is a need to assess our approach to grass cutting and habitat management in a wider sense. This should include the level of verge cutting provided by NFDC, and the further opportunities for managing our land for nature benefit more widely, and over a longer timeframe. Along with strategies on litter and management of trees, this could form part of a single “public realm” strategy that would set out our long-term approach to maintaining and enhancing our local environment. This would be in place ahead of Spring 2025, to set out the longer term approach to this issue.

5 CONCLUSIONS

5.1 The commitment to No Mow May is a way of visibly demonstrating commitment to the Council’s Climate and Nature Emergency and should continue in 2024, with the improvements and enhancements described above.

5.2 The Overview and Scrutiny Panel should consider the workplan and the timing for returning with more information on a “public realm strategy” at a future meeting.

6 FINANCIAL IMPLICATIONS

6.1 There may be some minimal savings on fuel, but there is also increased wear and tear on equipment once cutting recommences. Overall, the scheme is considered cost neutral. Any cost implications should be set against the environmental and climate benefits that schemes such as this deliver.

7 ENVIRONMENTAL IMPLICATIONS

7.1 The scheme is designed to support pollinators and other wildlife. As described above, an assessment of the impact on local wildlife will be undertaken in 2024.

8 EQUALITY & DIVERSITY, CRIME & DISORDER AND DATA PROTECTION IMPLICATIONS

8.1 There are none.

For further information contact:

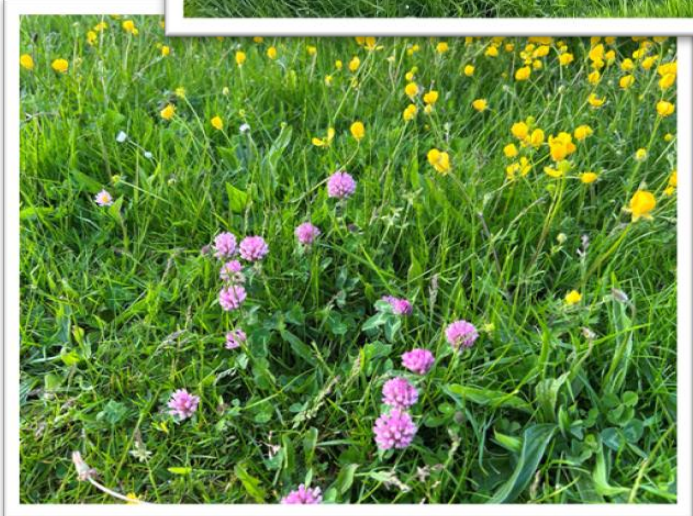
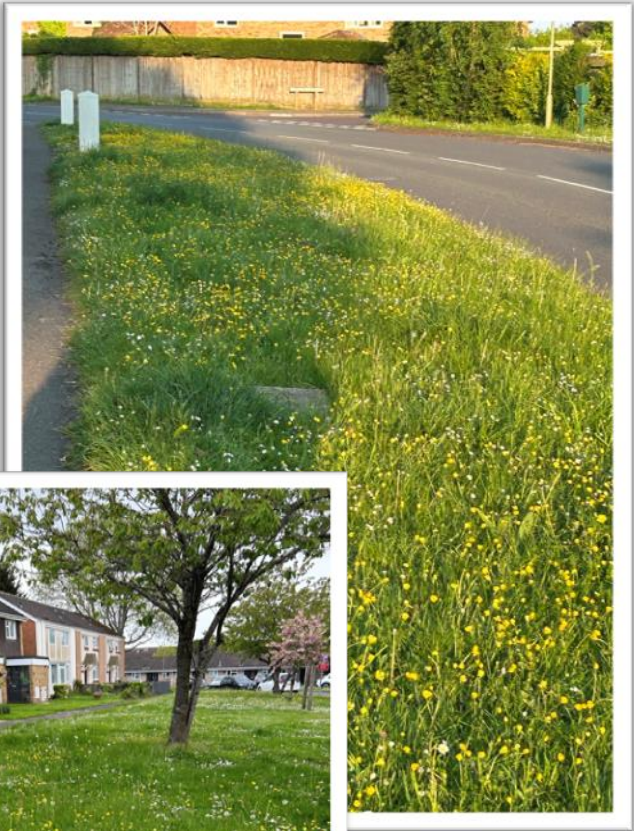
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Background Papers:

None

Photos from "No Mow May" 2023



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Environment and Sustainability Portfolio Performance Dashboard

Quarter 3: 1st October - 31st December 2023

Portfolio Holder - Cllr Geoffrey Blunden

Key Performance Indicators

Annual KPIs	Unit	Freq.	Last Quarter	Target	This Quarter	Desired DOT	Actual DOT	Status
Household waste sent for reuse, recycling and composting	%	Q	35.59%	55%	34.25%	Up	Down	
Coastal funding to achieve specific actions	Funding will be informed by the completion of the following two upcoming strategies: Christchurch Bay & Christchurch Harbour FCERM Strategy (September 2024), and Hurst Spit to Lymington FCERM Strategy (August 2026).							
Trees removed from NFDC land	Num	Annual	314	Monitor	Planting Season: October - March <u>All figures expected April 2024</u>			
Trees planted on NFDC land	Num	Annual	296	Monitor				
Quarterly KPIs	Unit	Freq.	Last Quarter	2022/23 Target	This Quarter	Desired DOT	Actual DOT	Status
Number of electric charging points	Num (Cumulative)	Q	0	10	0**	Up	-	
Total CO2 emissions saved through electric charging points***	kg (Cumulative)	Q	40,000 kg (Cumulative)	9,250 kg	TBC	Up	-	
Climate change action plan delivered against target	%	Q	Adopted in 2023	Monitor	Adopted in 2023	-	-	
Standard fly tipping incidents responded to	Number	Q	580	Monitor	549	Down	Down	
Specialist fly tipping**** incidents responded to	Num	Q	14	Monitor	18	Up	Up	

* Estimated value based on previous quarters and trends.

** The next installation will be 12 EV chargers at Ringwood in early spring but there have been no installations in Q2 and Q3.

***Data (including target) reflects cumulative CO2 emissions saved through electric charging points since programme launch in January 2020. Cumulative target updated quarterly.

**** 'Specialist fly tipping' refers to the incidents that have health or other implications, and require specialists (e.g. asbestos or clinical waste).

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Planning and Economy Portfolio Performance Dashboard

Quarter 3: 1st October - 31st December 2023

Portfolio Holder - Cllr Derek Tipp

Key Performance Indicators

Annual KPIs	Unit	Freq.	2022/23	Target	2023/24	Desired DOT	Actual DOT	Status
Number of houses completed each year (as set out in the Annual Authority Monitoring Report)	Num	Annual	193	400	Expected in July 2024	Up	Up	
Number of green infrastructure projects delivered each year	Num (cumulative)	Annual	5	3	3	Up	-	
Number of Biodiversity Net Gain projects delivered each year	Num	Annual	40 pp granted 15 implemented 5 occupied	Monitor	Expected in April 2024	Up	-	
Additional employment floorspace created within the district	m2	Annual	3,491 (net)	Monitor	Expected in July 2024	Up	Up	
Quarterly KPIs	Unit	Freq.	Last Quarter	Target	This Quarter	Desired DOT	Actual DOT	Status
Businesses engaged in the business engagement programme	Num (cumulative)	Q	82 (cumulative)	100 (Annual)	92 (cumulative)	Up	Up	On track for 2023/24
Film New Forest - Value of filming in the district	£ (cumulative)	Q	£43,000 (cumulative)	75,000 (Annual)	£45,500 (cumulative)	Up	Up	On track for 2023/24
Subscribers to 'Helping local businesses grow' e-news	Num	Q	3,549	3,000	3,526	Up	Down	
New Forest locations available to Film & TV productions via the Film:New Forest locations database	Num	Q	110	80	111	Up	Up	
New Forest District Council building control market share	%	Q	56.50%	55%	53%	Up	Down	
Determination of major planning applications within the nationally prescribed time frames	%	Q	100%	60%	100%	Up	-	
Determination of minor planning applications within the nationally prescribed time frames	%	Q	84%	70%	76%	Up	Down	
Determination of other planning applications within the nationally prescribed time frames	%	Q	91%	80%	89%	Up	Down	
Number of projects that New Forest District Council are involved in to deliver sustainable transport options	Num	Q	13	Monitor	13	Up	-	

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PLACE AND SUSTAINABILITY OVERVIEW AND SCRUTINY PANEL

WORK PROGRAMME 2023/2024

ITEM	OBJECTIVE	METHOD	LEAD OFFICER
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7 MARCH 2024

Water Disruption Update	To consider an update on water disruption within the District.	Report	Joanne McClay
Call-In Request – Hampshire Minerals and Waste Plan (Partial Update) Consultation Response	To consider the Councillor Call-Ins on the Portfolio Holder Decision to agree the proposed response to the Hampshire County Council’s Mineral and Waste Plan: Partial Update.	Report	Andrew Herring Tim Guymer
Solent Freeport, New Forest Delivery Plan	To consider the New Forest Delivery Plan for the Solent Freeport.	Report	Clive Tritton
Climate Change Supplementary Planning Document (SPD)	To consider the Climate Change SPD, following public consultation.	Report	Mark Williams Tim Guymer
Grass Cutting Programme – Spring 2024	To consider the Council’s approach to grass cutting in Spring 2024.	Report	Chris Noble Iain Park
Portfolio Holders’ Update	To receive an update from the relevant Portfolio Holders.	For information.	Cllr Blunden Cllr Tipp

ITEM	OBJECTIVE	METHOD	LEAD OFFICER
20 JUNE 2024			
Grass Strategy	To consider a proposed Grass Strategy.	Report	Ian Park
Litter Strategy	To consider a proposed Litter Strategy.	Report	Ian Park
Portfolio Holders' Update	To receive an update from the relevant Portfolio Holders.	For information.	Cllr Blunden Cllr Tipp
TO BE CONFIRMED			
Open Space Maintenance Update	To receive an update on Open Space Maintenance (See Financial Strategy Task and Finish Group Report – 17 November 2022).	Report	Ian Park
Future Joint Working Arrangements Between HCC and Hampshire Districts on Waste/Recycling	To consider a report on the future join working arrangements.	Report	Chris Noble
Tree Strategy	To consider a revised Tree Strategy.	Report	Chris Noble Ian Park
Climate and Nature Emergency Strategy 2024-2028	To consider the implementation of the strategy and the associated action plan.	Report	Roxie King